DRAFT

ENVIRONMENTAL IMPACT REPORT

BRAR FARMS RESIDENTIAL DEVELOPMENT PROJECT

WEST SACRAMENTO, CALIFORNIA

August 2026

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BRAR FARMS RESIDENTIAL DEVELOPMENT PROJECT

WEST SACRAMENTO, CALIFORNIA

Submitted to:

City of West Sacramento
Planning Division
1110 West Capitol Avenue, 2nd Floor
West Sacramento, California 95691

Prepared by:

LSA
1504 Eureka Road, Suite 310
Roseville, California 95661

Project No. 20252264

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LIST OF ABBREVIATIONS AND ACRONYMS

°C	degrees Celsius
°F	degrees Fahrenheit
µg/m^3	lead by lowering it from 1.5 to 0.15 micrograms per cubic meter
2017 Ozone Plan	2017 Sacramento Regional 2008 8-Hour Ozone and Further Reasonable Progress Plan
2025 Blueprint Plan	SACOG 2020–2050 Metropolitan Transportation Plan/Sustainable Communities Strategy
AAQS	ambient air quality standards
AB	Assembly Bill
AB 939	California Integrated Waste Management Act of 1989
ACMs	asbestos-containing materials
ACS	American Community Survey
ADT	average daily traffic
afy	acre-feet per year
AGR	agricultural supply
Air Quality/GHG/Energy Analysis	*Air Quality, Health Risk, Greenhouse Gas, and Energy Technical Memorandum*
AMM	Avoidance and Minimization Measure
A-P Act	Alquist-Priolo Earthquake Fault Zoning Act
APA	American Planning Association
API	American Petroleum Institute
APNs	Assessor's Parcel Numbers
APS	Alternative Planning Strategy
APSA	Aboveground Petroleum Storage Act

Assembly Bill 1575	Warren-Alquist Act
ASTM	American Society for Testing and Materials
Basin Plan	Water Quality Control Plan for the Sacramento and San Joaquin River Basins
BERD	Built Environment Resources Directory
bgs	below the ground surface
BMPs	best management practices
BSA	Biological Study Area
BTU	British Thermal Units
CAA	Clean Air Act
CAAP	Climate Action & Adaption Plan
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CAL FIRE	California Department of Forestry and Fire Protection
Cal/EPA	California Environmental Protection Agency
Cal/OSHA	California Division of Occupational Safety and Health
CalARP	California Accidental Release Prevention
CalEEMod	California Emission Estimator Model version 2022.1
CalGEM	California Geologic Energy Management Division
CALGreen Code	California Green Building Standards Code
California Register	California Register of Historical Resources
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan

CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CARB Handbook	*Air Quality and Land Use Handbook: A Community Health Perspective*
CBC	California Building Code
CCAA	California Clean Air Act
CCAP	Cache Creek Area Plan
CCR	California Code of Regulations
CCRMP	Cache Creek Resources Management Plan
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERS	California Environmental Reporting System
CESA	California Endangered Species Act
CFC	California Fire Code
CFD	Fire Services Community Facilities District
CFGC	California Fish and Game Code
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH_4	methane
CHHSL	California Human Health Screening Levels
CHP	California Highway Patrol
CHRIS	California Historical Resources Information System
CIP	Capital Improvement Project

City	City of West Sacramento
CIWMB	California Integrated Waste Management Board
CLOMR	Conditional Letter of Map Revision
CLUP	Comprehensive Land Use Plan
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
COLD	cold freshwater habitat
Conservancy	Yolo Habitat Conservancy
Cortese List	Hazardous Waste and Substances Sites List
County	Yolo County
CPTED	Crime Prevention Through Environmental Design
CPUC	California Public Utilities Commission
CR	County Road
CRECs	Controlled Recognized Environmental Conditions
CTR	California Toxics Rule
CUI	Culturally Unidentifiable Human Remains Inventories
CUPA	Certified Unified Program Agency
CVP	Central Valley Project
CWA	Clean Water Act
CWEA	California Water Environment Association

DA	Development Agreement
dB	decibel
dBA	A-weighted decibel
DCV	design capture volume
DDT	dichlorodiphenyltrichloroethane
DHS	California Department of Health Services
DMA	drainage management areas
DOC	California Department of Conservation
DOF	California Department of Finance
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
DUA	dwelling units per acre
DWR	California Department of Water Resources
EDD	California Economic Development Department
EFPD	Elkhorn Fire Protection District
EIA	United States Energy Information Administration
EIP	Early Implementation Project
EIR	Environmental Impact Report
EJ	environmental justice
EMFAC2025	California Emission Factor Model, Version 2025
EO	Executive Order
EOC	Emergency Operations Center
EONDX	Element Occurrence Index
EOP	Emergency Operations Plan

EPA	United States Environmental Protection Agency
ERIS	Environmental Risk Information Services
ESA	Endangered Species Act, also Environmental Site Assessment
FAA	Federal Aviation Administration
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FESA	federal Endangered Species Act
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
Forest Practice Act	Z'Berg-Nejedly Forest Practice Act
FRA	Federal Responsibility Area
FSZ	Farmland Security Zone
FTA	Federal Transit Administration
GHG	greenhouse gas
GKWTP	George Kristoff Water Treatment Plant
GPA	General Plan Amendment
gpd	gallons per day
GSA	Groundwater Sustainability Agencies
GSP	Groundwater Sustainability Plan
GWh	gigawatt-hours
GWP	global warming potential
HAs	Hydrologic Areas

HAZNET	Hazardous Waste Information System
HC	hydrocarbons
HCP/NCCP	Yolo Habitat Conservation Plan/Natural Community Conservation Plan, also Yolo HCP/NCCP
HFCs	hydrofluorocarbons
HOA	Homeowners Association
HPZ	Health Protection Zone
HRA	*Health Risk Assessment*
HRECs	Historical Recognized Environmental Conditions
HSAs	Hydrologic Subareas
HSC	California Health and Safety Code
HUs	Hydrologic Units
HVAC	heating, ventilation and air conditioning
I-5	Interstate 5
I-80	Interstate 80
ICS	Incident Command System
IESNA	Illuminating Engineering Society of North America
in/sec	inch/inches per second
IND	industrial service supply
IPCC	Intergovernmental Panel on Climate Change
IRA	Inflation Reduction Act
ITE	Institute of Transportation Engineers
ITP	Incidental Take Permit
kWh	kilowatt-hours

LCI	Governor's Office of Land Use and Climate Innovation
L_{dn}	day-night average noise level
LED	light emitting diode
LEED-ND	Leadership in Energy and Environmental Design-Neighborhood Development
L_{eq}	equivalent continuous sound level
LHMP	Local Hazard Mitigation Plan
LID	Low Impact Development
LLG	Linscott, Law & Greenspan, Engineers
L_{max}	maximum instantaneous noise level
LNWI	Lower Northwest Interceptor
LOMR	Letter of Map Revision
LOS	level of service
LR	Low-Density Residential
LRA	Local Responsibility Area
LSA	LSA Associates, Inc.
MAP	Mobility Action Plan
MBTA	Migratory Bird Treaty Act
MEI	maximally exposed individual
MEP	maximum extent practicable
mg/m^3	milligrams per cubic meter
mgd	million gallons per day
MIGR	migration of aquatic organisms
MLD	Most Likely Descendant

MMs	mitigation measures
MMT	million metric tons
mph	miles per hour
MPO	Metropolitan Planning Organization
MRMPs	Mineral Resource Management Policies
MRZs	Mineral Resource Zones
MS4	Municipal Separate Storm Sewer System
MTP/SCS	Metropolitan Transportation Plan/Sustainable Communities Strategy
MUN	municipal and domestic water supply
MW	megawatts
MWELO	Model Water Efficient Landscape Ordinance
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	California Native American Heritage Commission
National Register	National Register of Historic Places
NAV	navigation
NAVD88	North American Vertical Datum of 1988
NDWA	North Delta Water Agency
NEHRPA	National Earthquake Hazards Reduction Program Act
NF_3	nitrogen trifluoride
NFIP	National Flood Insurance Program
NFPA	National Fire Protection Association
NHPA	National Historic Preservation Act

NHTSA	National Highway Traffic Safety Administration
NIMS	National Incident Management System
NMFS	National Marine Fisheries Service
NO_2	nitrogen dioxide
NOI	Notice of Intent
NOP	Notice of Preparation
NOT	Notice of Termination
NOx	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPPA	Native Plant Protection Act
NPS	National Park Service
NRCS	Natural Resources Conservation Service
NWIC	Northwest Information Center
O_3	ozone
OCMP	Off Channel Mining Plan
OEHHA	California Office of Environmental Health Hazard Assessment
OHP	California Office of Historic Preservation
OHWM	ordinary high water mark
OPR	Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration
ozone season	May through October
Pb	lead
PCBs	polychlorinated biphenyls
PFCs	perfluorocarbons

PG&E	Pacific Gas and Electric Company
PM	particulate matter
PM_{10}	particulate matter less than 10 microns in size
$PM_{2.5}$	particulate matter less than 2.5 microns in size
Porter-Cologne Act	Porter-Cologne Water Quality Control Act
POW	hydropower generation
ppb	parts per billion
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
PRDs	Permit Registration Documents
PROC	industrial process supply
proposed project	Brar Farms Residential Development Project
PVC	polyvinyl chloride
R-1-A	Residential One Family
RCM	Regulatory Compliance Measure
RCP	reinforced concrete pipe
RCRA	Resource Conservation and Recovery Act
RD 900	Reclamation District No. 900
RE	Rural Estate (land designation), also Rural Real Estate
RE	Residential Rural Estates (zoning)
REC-1	water contact recreation
REC-2	non-contact water recreation
RECs	Recognized Environmental Conditions

RHNA	Regional Housing Needs Assessment
RHNP	Regional Housing Needs Plan
RMS	root mean square
ROG	reactive organic gases
RPS	California's Renewables Portfolio Standard
RTIP	Regional Transportation Improvement Program
RTP	Regional Transportation Plans
RWQCB	Regional Water Quality Control Board
SACOG	Sacramento Area Council of Governments
SacSewer	Sacramento Area Sewer District
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SCAOG	Sacramento Area Council of Governments
SCH	State Clearinghouse
SCS	Sustainable Communities Strategy
SDWA	Safe Drinking Water Act
SEMS	Standardized Emergency Management System
SF_6	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act
SHMA	Seismic Hazard Mapping Act
SHMP	State Hazard Mitigation Plan
SHPO	State Historic Preservation Officer
SIPs	State Implementation Plans
SLF	Sacred Lands File

SMAQD	Sacramento Metropolitan Air Quality District
SMARA	Surface Mining and Reclamation Act
SMARTS	Stormwater Multiple Application and Report Tracking System
SMF	Sacramento International Airport
SMGB	California State Mining and Geology Board
SO_2	sulfur dioxide
SPE	Specialized Professional Entities
SPWN	spawning, reproduction, and/or early development
SR-160	State Route 160
SR-84	State Route 84
SRA	State Responsibility Area
SRRE	Source Reduction and Recycling Element
SRWTP	Sacramento Regional Wastewater Treatment Plant
SVAB	Sacramento Valley Air Basin
SWMP	Stormwater Management Program
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TACs	toxic air contaminants
TAZ	Transportation Analysis Zone
TCRs	tribal cultural resources
TDR	Transfer of Development
Technical Advisory	LCI's *Technical Advisory on Evaluating Transportation Impacts in CEQA*
THPO	Tribal Historic Preservation Officer
TMDLs	Total Maximum Daily Loads

TMP	Transportation Management Plan
TOD	Transit Oriented Development
TPA	Transit Priority Area
TPZs	Timberland Production Zones
TRI	Toxics Release Inventory
Tribe	Yocha Dehe Wintun Nation
UFRR	Urban Flood Risk Reduction
ULOP	Urban Level of Flood Protection
US-50	United States Route 50
USACE	United States Army Corps of Engineers
USC	United States Code
USDA	United States Department of Agriculture
USDOT	United States Department of Transportation
USEPA or U.S. EPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
UWMP Act	Urban Water Management Planning Act
VAPA	Visual and Performing Arts
VdB	vibration velocity decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOCs	volatile organic compounds

VTSM	Vesting Tentative Tract Map
WARM	warm freshwater habitat
WDID	Waste Discharge Identification Number
WDRs	waste discharge requirements
WEAP	Workers Environmental Awareness Program
WILD	wildlife habitat
WM	Waste Management
WSAFCA	West Sacramento Area Flood Control Agency
WSCP	Water Shortage Contingency Plan
WSFD	West Sacramento Fire Department
WSLIP	West Sacramento Levee Improvement Program
WSPD	West Sacramento Police Department
WUI	wildland urban interface
WUSD	Washington Unified School District
YCEHD	Yolo County Environmental Health Department
Yolo HCP/NCCP	Yolo Habitat Conservation Plan/Natural Community Conservation Plan, also Plan
YSAQMD	Yolo Solano Air Quality Management District
YSGA	Yolo Subbasin Groundwater Agency
ZEVs	zero emission vehicles
ZNE	zero net energy

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1.0 EXECUTIVE SUMMARY

1.1 PURPOSE

This Draft Environmental Impact Report (EIR) has been prepared to evaluate the potential environmental impacts associated with the implementation of the Brar Farms Residential Development (proposed project). This Draft EIR has been prepared in compliance with the California Environmental Quality Act (CEQA) (California Public Resources Code Section 21000 et seq); the California CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq); and the rules, regulations, and procedures for implementing CEQA as adopted by the City of West Sacramento (City).

This Draft EIR is intended to serve as an informational document for public agency decision-makers and the public regarding the potential environmental impacts associated with the proposed project. The proposed project involves the subdivision of an approximately 60-acre property to create 259 lots for future single-family homes, comprising approximately 34.78 acres of residential development and 15 open space lots totaling 6.65 acres. In addition to identifying potential environmental impacts, this Draft EIR also identifies development standards and design guidelines that are part of the proposed Specific Plan that would reduce potential significant environmental impacts, and identifies potential mitigation measures and alternatives to reduce potential environmental impacts.

Environmental impacts cannot always be mitigated to a level that is considered less than significant. In accordance with Section 15093(b) of the *State CEQA Guidelines*, if a lead agency such as the City of West Sacramento approves a project (e.g., adoption of the proposed project) that has significant impacts that are not substantially mitigated (i.e., significant unavoidable impacts), the lead agency shall state in writing the specific reasons for approving the project, based on the final CEQA documents and any other information in the public record for the project. Section 15093 of the *State of CEQA Guidelines*, defines that as “a statement of overriding considerations.” The potential impacts of the proposed project are discussed in detail in Chapter 4 of this Draft EIR.

1.2 PROJECT SUMMARY

The following section describes the location of the proposed project, provides a project description, identifies the project objectives, summarizes the potential significant and unavoidable impacts that could result from the proposed project, and lists the agencies responsible for implementation of the proposed project.

1.2.1 Project Location

The approximately 60-acre project site is located at the corner of Marshall Road and Otis Avenue, in the western portion of the city of West Sacramento in Yolo County. The project site consists of five parcels (Assessor’s Parcel Numbers [APNs]: 045-260-008, -009, -010, 045-270-001,-002).

1.2.2 Project Description

The proposed project involves the subdivision of an approximately 60-acre property to create 259 lots for future single-family homes, comprising approximately 34.78 acres of residential development and 15 open space lots totaling 6.65 acres. The open space lots would include a 0.68-acre Central Park, a 0.14-acre parklet at the corner of Marshall Road and Otis Avenue, and 1.81 acres of landscaped lots distributed throughout the proposed development to provide greenspace and buffers. Additionally, the open space areas would include a 4.02-acre detention basin, which would also serve as a recreational field during dry seasons. Of the proposed residential lots, 242 would range in size from 5,000 to 8,400 net square feet. Seventeen of the proposed residential lots would be oversized lots and reach up to 14,800 net square feet. Landscaping, roadways, and utility improvements would also be installed on the project site.

The project would include the following actions and components to support the future construction of the residential development:

- Certification of the EIR
- An amendment to the City's General Plan
- An amendment to the Southport Framework Plan
- An amendment to the Zoning Map/Code
- A Tentative Subdivision Map
- Design Review Approval of Brar Farms Design Guidelines
- A Development Agreement
- Coverage under the Yolo Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP)

See Chapter 3.0, Project Description, of this Draft EIR for a more complete description of the proposed project.

1.2.3 Project Objectives

The following objectives have been established by the Project Applicant for the proposed project:

- To provide a mix of land uses and residential lot sizes with an innovative design approach to residential development.

- To provide open space, green areas, recreational amenities, and multi-use pathways and create an overall design that advances "smart growth" principles.

- To create a development plan that is focused on connectivity within and to adjacent neighborhoods and open spaces.

- To enhance the City's bike and pedestrian network of paths and dedicated bike routes.

- To create a mix of lot sizes and housing types integrated within open space land uses in a functional and logical manner.

- To create a creative approach to sustainable neighborhood design by integrating landscape design and environmental engineering practices into a comprehensive neighborhood plan.

- To provide a sufficient number of new housing units to assist the City in satisfying its Regional Housing Needs Allocation (RHNA) goals.

- To provide a sufficient number of residential units to support necessary improvements to public facilities.

1.2.4 Significant Unavoidable Adverse Impacts

With implementation of the mitigation measures recommended in this EIR, all project impacts would be reduced to a less than significant level except for impacts to Hydrology and Water Quality (flooding) and Transportation (VMT) as follows:

- As discussed in Section 4.10, Hydrology and Water Quality, the entire city is within the natural floodplain of the Sacramento River and could be subject to inundation if the levees were to fail. Although adherence to Chapter 15.50 of the City's Municipal Code, as detailed in **Regulatory Compliance Measure WQ-4,** would require either constructing flood management improvements or other mitigation measures, beyond those set forth in City's Floodplain Management Ordinance (Title 18 of the Municipal Code) or paying the "in-lieu" flood management fee in an amount established by resolution of the City council, no mitigation would reduce the potential flooding impact to less than significant. Accordingly, because the project site is located in a flood hazard zone (i.e., 200-year flood plain as mapped by the Department of Water Resources (DWR) pursuant to Senate Bill [SB] 5) and inundation at the project site could occur during a flood event, the proposed project could result in the release of pollutants due to inundation. Therefore, impacts would be **significant and unavoidable**.

- As discussed in Section 4.17, Transportation, of this Draft EIR, the proposed project would generate a residential vehicle miles traveled (VMT) per capita of 20.88, which is higher than both the City's 85 percent residential VMT per capita threshold (16.43) and the regional threshold (17.43). Although the project would employ specific design features and proposes several VMT reduction measures, these measures would only result in an estimated 3.03 percent reduction in residential VMT per capita. Therefore, the proposed project would result in a **significant and unavoidable** transportation impact related to VMT. As there are no additional feasible mitigation measures that would reduce project VMT, operation of the proposed project would result in a result in a **cumulatively significant and unavoidable transportation** impact related to VMT.

1.2.5 Lead Agency and Trustee Agencies

The lead agency for the proposed project is the City of West Sacramento. The City is the public agency that has the principal responsibility for certifying the EIR, approving or carrying out the project, or disapproving the project.

The responsible agencies are State and local public agencies other than the lead agency that have authority to carry out or approve a project or that are required to approve a portion of a project for which the lead agency is preparing or has prepared an EIR or Negative Declaration. The United

States Fish and Wildlife Service and the California Department of Fish and Wildlife have permitting authority for the project's coverage under the Yolo HCP/NCCP. No other agencies have approval or permitting approval for the adoption of the proposed project.

1.3 SUMMARY OF PROJECT ALTERNATIVES

In accordance with CEQA and the *State CEQA Guidelines* (Section 15126.6), an EIR must describe a reasonable range of alternatives to the project, or to the project's location, that could attain most of the project's basic objectives while avoiding or substantially lessening any of the significantly adverse environmental effects of the project. The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. CEQA states that an EIR should not consider alternatives "whose effect cannot be ascertained and whose implementation is remote and speculative" or which are infeasible.

The three alternatives to the proposed project discussed and analyzed in Chapter 6.0, Alternatives, of this EIR are:

- **Alternative 1 - No Project Alternative:** CEQA requires analysis of a "No Project" Alternative. The purpose of describing and analyzing a No Project Alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. According to *State CEQA Guidelines* Section 15126.6(e)(3)(C), the lead agency should proceed to analyze the impacts of the No Project Alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. Alternative 1 would not require the subdivision of an approximately 60-acre project site into 259 lots for future development of single-family homes, 15 lots for open space and park use, and associated landscaping, roadway, and utility improvements. The project site would therefore remain undeveloped and continue to be seasonally farmed for hay by a volunteer farmer and maintained by the property owner in the near term. Under Alternative 1, the project site would also continue to be designated as Rural Estates (RE) in the City's General Plan and the Southport Framework Plan, as well remain zoned RE under the City's Zoning Code. This would allow residential development of up to one unit per 2.5 acres. In addition, the RE zoning district would permit limited agricultural uses, public and quasi-public uses, and other uses that may be appropriate in a rural residential area. Under the No Project Alternative, a future development proposal by either the property owner or another entity could develop the site per the requirements of the RE zoning district, with approximately 24 single-family residential lots, each up to approximately 2.5 acres in size, with limited on-site infrastructure.

- **Alternative 2 - Reduced Density / Rural Buffer:** Similar to the proposed project, Alternative 2 would be located on the same approximately 60-acre site and would include similar landscaping, roadway, and utility improvements. The proposed 15 open space lots totaling approximately 6.65 acres, including the 0.68-acre Central Park, 0.14-acre parklet, 1.81 acres of landscaped lots, and 4.02-acre detention basin, would also be retained under this alternative. The proposed off-site frontage improvements along the north side of the project site on Marshall Road and along Otis Avenue frontage would also be constructed under this alternative. In addition, the

single-lane roundabout at the intersection of Marshall Road and Otis Avenue adjacent to the northeastern corner of the project site would also be developed. However, under Alternative 2, the proposed lots adjacent to the existing residential development to the south and west would be designated Residential-Rural Agricultural (RRA). The RRA zoning district is intended for rural residential development with limited agricultural uses and limited on-site water and sewer systems. This designation generally provides for between 0.5 and 1 dwelling unit per acre (DUA), with a minimum lot size of one acre. The remaining portions of the project site would be designated Residential One Family (R-1-B). The R-1-B district provides for single-unit dwellings and compatible public and quasi-public uses while maintaining the character of existing single-family neighborhoods. Under the R-1-B standards, minimum lot sizes would be 6,000 square feet, compared to the 5,000-square-foot minimum under the proposed R-1-A zoning, and residential densities would range from 1.1 to 6.0 dwelling units per gross acre, consistent with the City's LR General Plan land use designation. Additionally, similar to the proposed project, Alternative 2 would require an Amendment to the City's General Plan and an Amendment to the Southport Framework Plan to change the current RE designation to LR for the portion of the site proposed for R-1-B development and to RRA for the buffer area. A Zoning Map/Code Amendment would also be required to rezone the site from RE to a combination of RRA and R-1-B districts. In addition, under this alternative, it is assumed that total number of residential units would be reduced by approximately 20 percent, resulting in an estimated 207 lots, compared to 259 lots under the proposed project.

- **Alternative 3 -Mixed Use Alternative:** Similar to the proposed project, Alternative 3 would be located on the same approximately 60-acre site and would include similar landscaping, roadway, and utility improvements. The proposed 15 open space lots totaling approximately 6.65 acres, including the 0.68-acre Central Park, 0.14-acre parklet, 1.81 acres of landscaped lots, and 4.02-acre detention basin, would also be retained**.** The proposed off-site frontage improvements along the north side of the project site on Marshall Road and along Otis Avenue frontage would also be constructed under this alternative. In addition, the single-lane roundabout at the intersection of Marshall Road and Otis Avenue adjacent to the northeastern corner of the project site would also be developed. Under Alternative 3, roughly 24 residential lots, consisting of primarily 5,000-square-foot lots and one 7,200-square-foot lot, would be replaced by a 4-acre neighborhood-serving retail component. The retail area would be bounded by the existing retention pond at Bridgeway Lakes Community Park to the west and Marshall Road to the north. To accommodate the retail component, this 4-acre area would require an Amendment to the City's General Plan and an Amendment to the Southport Framework Plan to change the designation from RE to Mixed Use Neighborhood Commercial (MU-NC), as well as a Zoning Map/Code Amendment to rezone the area from RE to MU-NC. The MU-NC zone is intended to provide areas for a mix of medium-density residential units that support commercial retail, office, and open space uses. This zone allows for lower-intensity mixed-use development with residential townhomes, condos, and apartments integrated with pedestrian-oriented shopping, office, and open space. Uses are intended to provide essential daily services, retail needs, and recreational amenities within walking distance of the surrounding neighborhood. Residential densities range from 12 to 60 units per acre. This rezoning could also accommodate potential future higher-density residential development. Additionally, under Alternative 3, the remaining 234 residential lots would maintain the same lot size configurations, primarily ranging from

5,000–7,200 square feet, with ten oversized lots reaching up to 14,800 square feet. Similar to the proposed project, this alternative would also require an Amendment to the City's General Plan and an Amendment to the Southport Framework Plan to change designations from RE to LR, and a Zoning Map/Code Amendment to rezone the site from RE to R-1-A for the remainder of the project site.

1.4 IDENTIFICATION OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an Environmentally Superior Alternative among the proposed project and the alternatives evaluated in an EIR. *State CEQA Guidelines* Section 15126.6(e)(2) provides that, if the No Project Alternative is the Environmentally Superior Alternative, then the EIR shall also identify an Environmentally Superior Alternative among the other alternatives and the proposed project. As detailed in Chapter 5.0, Alternatives, of this Draft EIR, Alternative 1, the No Project Alternative, would have the least impact to the environment because it would generally reduce construction and operational impacts. While Alternative 1 would generally reduce the impacts of the proposed project, it would not achieve the objectives of the proposed project including providing a mix of land uses and residential lot sizes with an innovative design approach; creating open space, green areas, recreational amenities, and multi-use pathways that advance smart growth principles; enhancing connectivity within and adjacent to neighborhoods and open spaces; improving the City's bicycle and pedestrian network; creating a diverse mix of housing types integrated with open space in a functional and logical manner; promoting sustainable neighborhood design through integrated landscape and environmental practices; providing new housing to assist the City in meeting its RHNA goals; and supporting necessary public facility improvements. Additionally, Alternative 1, consistent with the proposed project, would result in a significant and unavoidable hydrology and water quality impact related to flooding and a significant and unavoidable transportation impact related to VMT. While Alternative 1 would be environmentally superior in the technical sense in that contribution to the aforementioned impacts would be generally reduced, it would fail to achieve any of the eight project objectives. *State CEQA Guidelines* Section 15126.6(e)(2) provides that, if the No Project/No Build Alternative is the Environmentally Superior Alternative, then the EIR shall also identify an Environmentally Superior Alternative among the other alternatives.

With the exception of Alternative 1, the environmentally superior alternative would be Alternative 2, the Reduced Density / Rural Buffer Alternative. Alternative 2 would result in similar or reduced environmental impacts compared to the proposed project. Although Alternative 2 would achieve all of the project objectives, it would not achieve objectives 7 or 8 to the same degree as the proposed project. Additionally, Alternative 2, consistent with the proposed project, would result in a significant and unavoidable hydrology and water quality impact related to flooding and a significant and unavoidable transportation impact related to VMT**.** While Alternative 3 would reduce some of the environmental impacts compared to the proposed project, it would increase construction and operational impacts associated with air quality, energy, greenhouse gas emissions, noise, public services, and transportation due to the addition of a 4-acre retail component. Similar to Alternative 2, and the proposed project, Alternative 3 would also result in a significant and unavoidable hydrology and water quality impact related to flooding and a significant and unavoidable transportation impact related to VMT**.** For the reasons presented above, Alternative 2 was identified as the Environmentally Superior Alternative.

1.5 AREAS OF CONTROVERSY

Pursuant to *State CEQA Guidelines* Section 15123, this EIR identifies areas of controversy and issues to be resolved that are known to the City or were raised during the public scoping process. In accordance with *State CEQA Guidelines* Sections 15082 and 15083, the City circulated a Notice of Preparation (NOP) of an Environmental Impact Report for a 30-day public review and comment period beginning Wednesday, September 10, 2025, and ending Friday, October 10, 2025. In addition, the City held a public scoping meeting on Monday, October 6, 2025, at The Boathouse at Bridgeway Lakes to present the proposed project and to solicit input from interested agencies and members of the public regarding environmental issues that should be addressed in this EIR.

Based on comments received from agencies, organizations, and individuals during the scoping meeting and the initial review period, the City extended the NOP comment period until October 24, 2025, to provide additional opportunity for input. The comments received during the scoping period addressed concerns under the following environmental resource topics:

- Aesthetics
- Air Quality
- Biological Resources
- Geology and Soils
- Greenhouse Gases
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Utilities and Services Systems
- Recreation
- Transportation
- Wildfire

Please note that this is not an exhaustive list of areas of controversy but rather key issues that were raised during the scoping process. This EIR addresses each of these areas of concern or controversy in detail, examines project-related and cumulative environmental impacts, identifies significant adverse environmental impacts, and proposes mitigation measures and/or alternatives designed to reduce or eliminate potentially significant impacts. **Appendix A** to this EIR includes the NOP, copies of written comments received in response to the NOP, and comments received at the Public Scoping Meeting, as well as written comment cards received in response to the public scoping meeting. **Appendix A** also includes a comment summary.

1.6 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation, identifies the potential project environmental impacts, proposed mitigation measures, and level of significance after mitigation is incorporated into the project. Environmental topics addressed in this EIR include Aesthetics, Agricultural and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire.

1.6.1 Secondary Effects of Mitigation Measures

In accordance with *State CEQA Guidelines* Section 15126.4(a)(1)(D), if any mitigation measure would cause one or more significant effects in addition to those that would be caused by the proposed project, the effects of the mitigation measure shall be discussed. The mitigation measures proposed (as listed on **Table 1.A**) require the Applicant to provide the City with construction plans or provide evidence that the project would adhere to existing programs, regulations, or recommendations in technical reports. The regulations and policies listed in the mitigation measures have been evaluated during their respective adoption or approval processes. No secondary effects related to the proposed mitigation measures are expected to occur.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
4.1: AESTHETICS			
Threshold 4.1.1: The proposed project would not have a substantial adverse effect on a scenic vista.	Less Than Significant Impact.	No mitigation is required.	Less Than Significant Impact.
Threshold 4.1.2: The proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.	No Impact.	No mitigation is required.	No Impact.
Threshold 4.1.3: The proposed project would not conflict with applicable zoning and other regulations governing scenic quality.	Less Than Significant Impact.	No mitigation is required.	Less Than Significant Impact.
Threshold 4.1.4: The proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	Less Than Significant Impact.	No mitigation is required.	Less Than Significant Impact.
Cumulative Impact related to Aesthetics: The proposed project would adhere to City and State regulations designed to reduce and/or avoid impacts related to aesthetics and therefore would not result in cumulative impacts to aesthetics.	Less Than Significant Impact.	No mitigation is required.	Less Than Significant Impact.
4.2: AGRICULTURE AND FORESTRY			
Threshold 4.2.1: The proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.	Less Than Significant Impact.	No mitigation is required.	Less Than Significant Impact.
Threshold 4.2.2: The proposed project would not conflict with existing zoning or agricultural use, or a Williamson Act contract.	Less Than Significant Impact.	No mitigation is required.	Less Than Significant Impact.
Threshold 4.2.3: The proposed project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section	No Impact.	No mitigation is required.	No Impact.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
51104(g)).			
Threshold 4.2.4: The proposed project would not result in the loss of forest land or conversion of forest land to non-forest use.	No Impact.	No mitigation is required.	No Impact.
Threshold 4.2.5: The proposed project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.	Less Than Significant Impact.	No mitigation is required.	Less Than Significant Impact.
Cumulative Impact related to Agricultural Resources: The proposed project is not located on or nearby existing agricultural or forest land and would not result in cumulative impacts related to agriculture and forestry.	Less Than Significant Impact.	No mitigation is required.	Less Than Significant Impact.
4.3: AIR QUALITY			
Threshold 4.3.1: The proposed project would result in short-term construction and long-term operational pollutant emissions. The proposed project would not result in the generation of criteria air pollutants that would exceed YSAQMD thresholds of significance.	Less Than Significant Impact.	**Regulatory Compliance Measure AIR-1. Fugitive Dust Measures**: The City or construction contractor shall implement the following measures at the project site: ● Water all active construction sites at least twice daily. Frequency shall be based on the type of operation, soil, and wind exposure. ● Haul trucks shall maintain at least 2 feet of freeboard; ● Cover all trucks hauling dirt, sand, or loose materials; ● Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut and fill operations and hydroseed area; ● Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days); ● Plant vegetative ground cover in disturbed areas as soon as possible; ● Cover inactive storage piles; and ● Sweep streets if visible soil material is carried out from the construction site.	Less Than Significant Impact.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
		• Treat accesses to a distance of 100 feet from the paved road with a 6- to 12-inch layer of wood chips or mulch or 6-inch layer of gravel.	
Threshold 4.3.2: The proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.	Less Than Significant Impact.	Refer to **Regulatory Compliance Measure AIR-1,** under Threshold 4.3.1, above.	Less Than Significant Impact.
Threshold 4.3.3: Construction of the project would generate diesel exhaust from construction equipment, which could pose a health risk to nearby sensitive receptors, including residences, schools, and the elderly.	Potentially Significant Impact.	**Mitigation Measure AIR-1: Tier 3 Construction Equipment.** All off-road diesel-powered construction equipment of 25 horsepower or more used during construction of the proposed project shall be equipped with Tier 3 engines or higher, as certified by the California Air Resources Board. The equipment shall be properly maintained and tuned in accordance with manufacturer specifications. Prior to issuance of building permits, the Project Applicant shall submit construction plans to the City of West Sacramento denoting the projected equipment Tier rating that will be used during the construction	Less Than Significant Impact with Mitigation.
Threshold 4.3.4: The proposed project would not result in other emissions (such as those leading to odors adversely affecting a substantial number of people).	Less Than Significant Impact.	No mitigation is required.	Less Than Significant Impact.
Cumulative Impact related to Air Quality: The proposed project's construction-related regional daily emissions would exceed YSAQMD significance thresholds for VOCs if constructed at the same time as the Brar Farms Residential Development Project. Therefore, the proposed project's cumulative air quality impacts would be potentially significant.	Potentially Significant Impact.	Please refer to **Regulatory Compliance Measure AIR-1**, under Threshold 4.3.1, above, and **Mitigation Measure AIR-1,** under Threshold 4.3.3, above.	Less Than Significant Impact with Mitigation.
4.4: BIOLOGICAL RESOURCES			
Threshold 4.4.1: Implementation of the proposed project would involve disturbance of the approximately 60-acre project site, resulting in the conversion of the site from ruderal grasslands to developed land uses and the permanent loss of 58.34 acres of potential foraging	Potentially Significant Impact.	**Mitigation Measure BIO-1: Preconstruction Surveys (Swainson's Hawks and White-Tailed Kite)**. In accordance with guidance provided by the Swainson's Hawk Technical Advisory Committee (2000), if work begins during the nesting season (March 15 to August 30), an early season preconstruction	Less Than Significant Impact with Mitigation.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
habitat for special-status wildlife. As such, development of the proposed project could adversely affect special-status wildlife species as a result of project-related activities. Construction activities would permanently remove 58.34 acres of ruderal grasslands that provide suitable foraging habitat for Swainson's hawks, white-tailed kites, and other bird species protected under the Migratory Bird Treaty Act and/or the California Fish and Game Code. No suitable nest trees for Swainson's hawks or white-tailed kites were observed to occur within the BSA; however, construction-related disturbance (e.g., noise, vehicle traffic, personnel working adjacent to occupied nesting habitat) could indirectly impact other nesting birds in the vicinity by causing adults to abandon nests, resulting in nest failure and reduced reproductive success if work occurs during the nesting season (February 1 to August 31). As such, the proposed project would have a potentially substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.		survey for nesting Swainson's hawks shall be conducted between January and March in the Biological Study Area (BSA) and immediate vicinity (an approximately 1,320-foot [0.25 mile] radius) by a qualified biologist when tree foliage is relatively sparse and nests are easy to identify. A second preconstruction survey for nesting Swainson's hawk shall be conducted in the BSA and immediate vicinity (an approximately 1,320-foot [0.25 mile] radius) by a qualified biologist no more than 15 days prior to initiation of earth moving activities. **Mitigation Measure BIO-2: Active Nest Buffer (Swainson's Hawk and White-Tailed Kite).** If nesting Swainson's hawk or white-tailed kite are found within the survey area, a 1,320-foot (0.25-mile) initial temporary nest disturbance buffer shall be established. If project activities within the temporary nest disturbance buffer are determined to be necessary during the nesting season, a qualified biologist shall evaluate the potential for the project to disturb nesting activities. California Department of Fish and Wildlife (CDFW) shall be contacted to review the evaluation and determine if the project can proceed without adversely affecting nesting activities. Work will only be allowed to proceed within the temporary nest disturbance buffer. Disturbance of active nests shall be avoided until it is determined by a qualified biologist that nesting is complete and the young have fledged or that the nest has failed. Work is allowed to proceed within the temporary nest disturbance buffer if Swainson's hawk are not exhibiting agitated behavior (e.g., defensive flights at intruders, getting up from a brooding position, flying off the nest). A qualified biologist shall be on-site daily while construction activities are occurring within the temporary nest disturbance buffer to monitor nesting activity. The monitor shall have the authority to stop work if it is determined the project is adversely affecting nesting activities.	

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
		Mitigation Measure BIO-3: Preconstruction Survey (Nesting Birds). If work begins during the nesting season (February 1 and August 31), preconstruction surveys shall be conducted by a qualified biologist no more than 14 days prior to commencement of any construction activities. **Mitigation Measure BIO-4. Active Nest Buffer (Nesting Birds).** If active nests are identified during the preconstruction survey(s), appropriate buffers shall be established to protect nesting activity. The width of the buffer zone shall be based on a site-specific analysis considering the species, nest location, and observed behavior prepared by a qualified Biologist. Initial buffer standards shall be a minimum of 25 feet for non-raptor bird species and a minimum of 250 feet for raptor species. All construction work shall be conducted outside any designated avoidance zones. Standard buffer zones shorter or larger than minimum buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The biologist shall have full discretion for establishing a suitable buffer. The buffer area(s) shall be closed to all construction personnel and equipment until the young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed and young have fledged the nest prior to removal of the avoidance buffer.	
Threshold 4.4.2: The field survey did not identify any riparian or other sensitive natural communities within the project site. The project site is characterized by ruderal grasslands. As such, implementation of the proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS, and no impact would occur. As such, the proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local	No Impact.	No mitigation is required.	No Impact.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
or regional plans, policies, regulations, or by the CDFW or USFWS.			
Threshold 4.4.3: According to the USFWS National Wetland Inventory there are no riverine or other freshwater resources mapped within the boundaries of the project site. However, two aquatic resources a 6.29-acre Freshwater Pond (approximately 150 feet west of the project site), and 3.39-acre Freshwater Pond (approximately 600 feet west of the project site) are located within the vicinity of the project site. In addition, during the field no aquatic resources were observed within the BSA. The nearest aquatic resources include a retention pond and a drainage ditch west of the BSA. The retention pond is in open space that is part of the Bridgeway Lakes Community Park. As such, The BSA does not contain any aquatic resources; therefore, the project would have no effect on federally protected wetlands. Therefore, the proposed project would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	No Impact.	No mitigation is required.	No Impact.
Threshold 4.4.4: The project site is bounded to the north by Marshall Road, to the east by Otis Avenue and a mix of residential and agricultural uses, to the south by single-family residential uses, and to the west by an existing retention pond that is part of the Bridgeway Lakes Community Park, and the Bridgeway Lakes residential development. The project site and adjacent areas are entirely developed. In its exiting condition, the project site is an undeveloped lot that was historically used for agricultural purposes and is seasonally farmed for hay by a volunteer farmer and maintained by the	Less Than Significant Impact.	No mitigation is required.	Less Than Significant Impact.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
property owner, who mows and tills the land as needed. There is no evidence that the ruderal grasslands in the BSA provide a significant wildlife movement corridor or migration route. The BSA is heavily impacted by human activity (e.g., agriculture, recreation use of nearby open space, residential occupation) and provides little to no connectivity between regional open spaces in the vicinity. The nearest significant wildlife movement corridors likely include the Sacramento River, the Yolo Bypass Wildlife Area, and the Sacramento River Deep Water Ship Channel. As such, the proposed project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.			
Threshold 4.4.5: Two trees are within the BSA along Marshall Road: a valley oak (*Quercus lobata*) and an elm (*Ulmus* sp.). Neither tree meets the definition of a "Heritage tree," "Landmark tree," or "Street tree" as defined in Section 8.24.020 of the City's Municipal Code. As a result of the proposed project, both trees would be removed, which would require issuance of a tree permit from the City's Tree Administrator. As such, the proposed project could conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance due to the removal of two trees within the project site.	Less than Significant Impact.	**Regulatory Compliance Measure BIO-1: Tree Plan.** The Project Applicant shall submit, along with their application for project development, a detailed tree plan. The tree plan shall contain the information detailed in Ordinance 8.24.090, including a contour map showing the location, size, species, and condition of all trees located on the property proposed for development; identification of the trees proposed to be preserved and those heritage, landmark, and street trees proposed to be removed and the reason for their removal; description of the measures to be followed to ensure survival of heritage, landmark, and street trees during construction; a program for the preservation of these trees during and after completion of the project; and a program for the replacement of any trees proposed to be removed.	Less than Significant Impact.
Threshold 4.4.6: The Project Site is located within the Yolo Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP). The proposed project would provide suitable habitat for Swainson's hawk and	Potentially Significant Impact.	Refer to **Mitigation Measures BIO-1 through BIO-4**, under Thresholds 4.4.1 and 4.4.5, above. **Regulatory Compliance Measure BIO-1: Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP)**	Less Than Significant Impact with Mitigation.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
white-tailed kite, both of which have the potential to occur within the BSA and are covered species under the Yolo HCP/NCCP. Therefore, the project would be required to implement applicable HCP/NCCP avoidance and minimization measures. Through payment of HCP/NCCP fees or implementation of equivalent mitigation, the project would contribute to the HCP/NCCP's conservation strategy, thereby benefiting the above-listed covered species. With incorporation of these fees or equivalent mitigation and adherence to all other applicable HCP/NCCP avoidance and minimization measures, the project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or any other approved local, regional, or State habitat conservation plan. As such, the proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.		**Application Package**. The Project Applicant shall submit an HCP/NCCP application package to the City. The City shall undertake review of take authorization applications concurrent with California Environmental Quality Act (CEQA) environmental review. This review shall include consideration of CEQA exemptions and whether a project is covered by a prior programmatic or earlier CEQA document. To facilitate this approach, the City should require project proponents to submit initial HCP/NCCP application package information as part of the land use approval application and CEQA process. ● HCP/NCCP Application Package. Private project proponents covered by the Yolo HCP/NCCP must complete an HCP/NCCP application package. Proponents of private projects under the discretion of Permittees must submit the application to the relevant Permittee for review and approval to receive coverage under this HCP/NCCP. The project proponent is responsible for preparing the application package and conducting any necessary field surveys, if required. The application package must contain the items listed below, if applicable: 1. Project application form. The project application form will contain basic information about the project. The Conservancy will provide required forms through the websites of the Permittees and the Conservancy. 2. Project description, vicinity map, and detail map. The application package will include a brief project description, vicinity map, and detail map. The project description will include the location, assessor's parcel number(s), construction activity or maintenance methods, a description of the nature of the impacts (permanent or temporary), and timing (including duration) of the project or activity. The project description will document that the project is a covered activity (Chapter 3, Covered Activities). The vicinity map will document that the project	

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
		site is in the HCP/NCCP Plan area and include any streams or water bodies that fall within the project area. The detail map will show the fee area, also known as the area of impact. This is the area the Conservancy will use to determine fees, as described in Chapter 8, Section 8.4.1.2, Land Cover Fee. The Conservancy will provide further guidance in the implementation handbook for identification of the area of impact. The detailed map must also show any relevant landforms, roads, water bodies, and existing and proposed structures that will be affected by the proposed project. 3. Land cover mapping and planning-level surveys. The project proponent will retain a qualified biologist to conduct planning-level surveys and identify natural communities and important elements of covered species habitat in the area of impact. Planning-level surveys provide information on the natural communities and covered species present at a project site to comply with the AMMs (Section 4.3, Avoidance and Minimization Measures) and document key resources for tracking and reporting purposes. These surveys are required for all covered activities that result in ground disturbance or other effects that could result in take of covered species or natural communities. 4. Verification of land cover impacts. Based on the maps created during planning-level surveys, as described in Section 4.2.2.3, Item 3: Land Cover Mapping and Planning-Level Surveys, the project proponent must provide the acres of effect (and linear feet of impacts for stream channels) in the area of impact (defined in Section 8.4.1.2, Land Cover Fee) by land cover type (Table 2-1, Natural Communities and Other Land Cover Types). The Conservancy will use these calculations to track natural community and covered species habitat loss under this	

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
		HCP/NCCP by land cover type. The tracking must be based on actual loss of each land cover type. See Section 7.5.11, Compliance Tracking, for appropriate data sources for effect calculations. Permittee planning staff members or the Conservancy will verify that a qualified biologist completed the land cover mapping and calculations. Permittee planning staff members will verify land cover data determinations provided by all project proponents within the Permittee's jurisdiction, and the Conservancy will verify all land cover data determinations provided by Specialized Professional Entities (SPEs) (see Chapter 8, Section 8.4.1.2, Land Cover Fee, for a description of area of impact). The Permittee and the Conservancy will verify land cover data determinations at the time applications are submitted because of the potential for land cover to change over time. 5. Avoidance and minimization measure plan. Based on the results of steps 1 and 3, above, the project proponent will identify applicable AMMs and include these in an AMM plan, which will be submitted with the application package. The project proponent will include monitoring requirements in the AMM plan and surveys provided by a qualified biologists, as needed, based on requirements described in Section 4.3, Avoidance and Minimization Measures. 6. HCP/NCCP Fees or Equivalent Mitigation. The project proponent will estimate fees based on the information provided, using a fee calculator developed by the Conservancy and the calculation methods described in Section 8.4.1.2, Land Cover Fee. If the project proponent proposes to purchase credits at a United States Fish and Wildlife Service (USFWS) - or CDFW-approved mitigation bank, the proponent must indicate this upon project approval. The Conservancy may authorize use of an	

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
		approved mitigation bank or mitigation receiving site for in-county mitigation if it meets HCP/NCCP requirements, including monitoring and adaptive management requirements, and pays all appropriate fees **Mitigation Measure BIO-5:** Confine and Delineate Work Area. Mitigation Measure BIO-5 applies Yolo HCP/NCCP Avoidance and Minimization Measure (AAM) 3. Where natural communities and covered species habitat are present, workers shall confine land clearing to the minimum area necessary to facilitate construction activities. Workers shall restrict movement of heavy equipment to and from the project site to established roadways to minimize natural community and covered species habitat disturbance. The Project Applicant shall clearly identify boundaries of work areas using temporary fencing or equivalent and shall identify areas designated as environmentally sensitive. All construction vehicles, other equipment, and personnel shall avoid these designated areas. **Mitigation Measure BIO-6: Conduct Worker Training.** Mitigation Measure BIO-6 applies Yolo HCP/NCCP AAM6. All construction personnel shall participate in a worker environmental training program approved/authorized by the Conservancy and administered by a qualified biologist. The training shall provide education regarding sensitive natural communities and covered species and their habitats, the need to avoid adverse effects, State and federal protection, and the legal implications of violating the FESA and NCCPA Permits. A pre-recorded video presentation by a qualified biologist shown to construction personnel may fulfill the training requirement. **Mitigation Measure BIO-7: Control Nighttime Lighting of Project Construction Sites.** Mitigation Measure BIO-7 applies Yolo HCP/NCCP AAM7. Workers shall direct all lights for nighttime lighting of project construction sites into the project construction area and minimize the lighting of natural habitat	

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
		areas adjacent to the project construction area. **Mitigation Measure BIO-8: Avoid and Minimize Effects of Construction Staging Areas and Temporary Work Areas.** The Project Applicant should locate construction staging and other temporary work areas for covered activities in areas that would ultimately be a part of the permanent project development footprint. If construction staging and other temporary work areas must be located outside of permanent project footprints, they shall be located either in areas that do not support habitat for covered species or are easily restored to prior or improved ecological functions (e.g., grassland and agricultural land). Construction staging and other temporary work areas located outside of project footprints shall be sited in areas that avoid adverse effects on the following: ● Serpentine, valley oak woodland, alkali prairie, vernal pool complex, valley foothill riparian, and fresh emergent wetland land cover types. ● Occupied western burrowing owl burrows. [Occupied for the purpose of AMM8 means at least one burrowing owl has been observed occupying the burrow within the last three years. Occupancy of a burrow may also be indicated by owl sign at the burrow entrance, including molted feathers, cast pellets, prey remains, eggshell fragments, or excrement at or near a burrow entrance or perch site] ● Nest sites for covered bird species and all raptors, including noncovered raptors, during the breeding season. The Project Applicant shall follow specific Avoidance and Minimization Measures (AMMs) for sensitive natural communities as identified in Section 4.3.3, Sensitive Natural Communities and Section 4.3.4, Covered Species of the Yolo HCP/NCCP. For establishment of temporary work areas outside of the project footprint, project proponents shall conduct surveys to determine if any of the biological resources listed	

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
		above are present. Within one year following removal of land cover, project proponents will restore temporary work and staging areas to a condition equal to or greater than the covered species habitat function of the affected habitat. Restoration of vegetation in temporary work and staging areas will use clean, native seed mixes approved by the Yolo Habitat Conservancy (Conservancy) that are free of noxious plant species seeds.	
Cumulative Impacts to Biological Resources: The proposed project could result in a significant contribution to cumulative impacts related to biological resources species.	Potentially Significant Impact.	Refer to **Regulatory Compliance Measure BIO-1** and **Mitigation Measures BIO-1** through **BIO-4**, under Thresholds 4.4.1 and 4.4.5, above. Refer to **Regulatory Compliance Measure BIO-2** and **Measure Mitigation Measures BIO-5** through **BIO-8**, under Threshold 4.4.6, above.	Less Than Significant Impact with Mitigation.
4.5: CULTURAL RESOURCES			
Threshold 4.5.1: Although the field survey did not identify any cultural resources within the project area, the designation of the eastern portion of the project area as a tribal cultural landscape in conjunction with known historic buildings and agricultural use within the project area indicates an increased probability for surface and subsurface prehistoric and historic resources. As such, the proposed project could cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.	Potentially Significant Impact.	Refer to **Mitigation Measure TCR-1,** under Threshold 4.18.1, below. **Mitigation Measure CUL-1: Protection of Known and Unknown Archaeological Resources.** The following shall be implemented by the construction contractor during any ground-disturbing activities associated with project construction: • In the event that unknown cultural deposits (e.g., sites, features, or artifacts) are encountered during project construction, all ground-disturbing activity within 100 feet of the resources shall immediately be halted and a qualified professional archaeologist (36 Code of Federal Regulations [CFR] 61) and appropriate Native American tribal representative shall be notified immediately and retained to assess the significance of the find. Construction activities could continue in other areas of the project Site. • If the find is determined to be significant by the qualified archaeologist or Native American tribe (i.e., because it is determined to constitute either a historical resource or a unique archaeological resource), the archaeologist shall	Less than Significant Impact with Mitigation.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
		develop appropriate procedures to protect the integrity of the resource and ensure that no additional resources are affected. Procedures could include, but would not necessarily be limited to, preservation in place, archival research, subsurface testing, or contiguous block unit excavation and data recovery. • If the qualified archaeologist determines the archaeological material to be Native American in nature, the project proponent shall immediately contact the culturally affiliated Native American tribe for their input on the preferred treatment of the find.	
Threshold 4.5.2: Although the field survey did not identify any cultural resources within the project area, the designation of the eastern portion of the project area as a tribal cultural landscape in conjunction with known historic buildings and agricultural use within the project area indicate an increased probability for surface and subsurface prehistoric and historic resources. As such, the proposed project would potentially cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.	Potentially Significant Impact.	**Regulatory Compliance Measure CUL-1: Unanticipated Discovery of Human Remains.** If human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall take place until the Yolo County Coroner has made a determination of origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be Native American, the County Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD will have the opportunity to offer recommendations for the disposition of the remains.	Less than Significant Impact with Mitigation.
Threshold 4.5.3: There are no known human remains on the project site. However, construction facilitated by the proposed project would include ground disturbing activities including grading and excavation. Ground-disturbing activity associated with project implementation has the potential to disturb previously unknown human remains.	Less than Significant Impact.	Refer to **Regulatory Compliance Measure CUL-1** under Threshold 4.5.2, above.	Less than Significant Impact.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
Cumulative Impacts to Cultural Resources: Potential impacts of the proposed project to unknown cultural resources, when combined with the impacts of past, present, and reasonably foreseeable projects in West Sacramento, could contribute to a cumulatively significant impact to cultural resources due to existing regulatory compliance measures.	Potentially Significant Impact.	Refer to **Mitigation Measures CUL-1** and **Regulatory Compliance Measure CUL-1** under Thresholds 4.5.1 and 4.52, above. Refer to **Mitigation Measures TCR-1 and TCR-2** in Section 4.18, Tribal Cultural Resources, under Thresholds 4.18.1 and 4.18.2.	Less than Significant Impact with Mitigation.
4.6: ENERGY			
Threshold 4.6.1: The proposed project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.	Less than Significant Impact.	No mitigation is required.	Less Than Significant Impact.
Threshold 4.6.2: The proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.
Cumulative Impacts related to Energy: There are sufficient planned energy supplies to serve the proposed project and related projects. The proposed project's contribution to impacts related to the inefficient, wasteful, and unnecessary consumption of energy would not be cumulatively considerable.	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.
4.7: GEOLOGY AND SOILS			
Threshold 4.7.1(i): The proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.
Threshold 4.7.1(ii): The proposed project could directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving strong seismic	Potentially Significant Impact.	**Mitigation Measure GEO-1: Implementation of Geotechnical Evaluation Recommendations.** The Project Applicant's construction contractor shall implement the recommendations	Less than Significant Impact with Mitigation.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
ground shaking.		of the Geotechnical Engineering Report prepared for the proposed project, as applicable, to the satisfaction of the City of West Sacramento's (City) Building Official, or designee. The City's Building Official, or designee, shall confirm recommendations have been implemented into the design and construction of the proposed project prior to the issuance of a building permit.	
Threshold 4.7.1(iii): The proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.
Threshold 4.7.1(iv): The proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.	No Impact.	No mitigation is required.	No Impact.
Threshold 4.7.2: The proposed project would not result in substantial soil erosion or the loss of topsoil.	Less than Significant Impact.	Refer to **Regulatory Compliance Measure WQ-1** and **WQ-3** in Section 4.10, Hydrology and Water Quality, under Threshold 4.10.1.	Less than Significant Impact.
Threshold 4.7.3: The proposed project would be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.	Potentially Significant Impact.	Refer to **Mitigation Measure GEO-1** under Threshold 4.7.1(ii**)** and **Regulatory Compliance Measure WQ-2** in Section 4.10, Hydrology and Water Quality, under Threshold 4.10.1.	Less than Significant Impact with Mitigation.
Threshold 4.7.4: The proposed project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.	Potentially Significant Impact.	Refer to **Mitigation Measure GEO-1** under Threshold 4.7.1(ii), above.	Less than Significant Impact with Mitigation.
Threshold 4.7.5: The proposed project would not have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water	No Impact.	No mitigation is required.	No Impact.
Threshold 4.7.6: The proposed project would potentially	Potentially	**Mitigation Measure GEO-2: Discovery of Paleontological**	Less than Significant

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	Significant Impact.	**Resources.** Should paleontological resources be encountered during project subsurface construction activities, all ground-disturbing activities within 25 feet shall be redirected and a qualified paleontologist contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. For purposes of this mitigation, a "qualified paleontologist" shall be an individual with the following qualifications: (1) a graduate degree in paleontology or geology and/or a person with a demonstrated publication record in peer-reviewed paleontological journals; (2) at least two years of professional experience related to paleontology; (3) proficiency in recognizing fossils in the field and determining their significance; (4) expertise in local geology, stratigraphy, and biostratigraphy; and (5) experience collecting vertebrate fossils in the field. If the paleontological resources are found to be significant and project activities cannot avoid them, measures shall be implemented to ensure that the project does not cause a substantial adverse change in the significance of the paleontological resource. Measures may include monitoring, recording the fossil locality, data recovery and analysis, a final report, and accessioning the fossil material and technical report to a paleontological repository. Upon completion of the assessment, a report documenting methods, findings, and recommendations shall be prepared and submitted to the City for review. If paleontological materials are recovered, this report also shall be submitted to a paleontological repository such as the University of California Museum of Paleontology, along with significant paleontological materials. Public educational outreach may also be appropriate. The Applicant shall inform its contractor(s) of the sensitivity of the project site for paleontological resources and shall verify that the following directive has been included in the appropriate contract documents:	Impact with Mitigation.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
		"The subsurface of the construction site may be sensitive for fossils. If fossils are encountered during project subsurface construction, all ground-disturbing activities within 25 feet shall be redirected and a qualified paleontologist contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. Project personnel shall not collect or move any paleontological materials. Fossils can include plants and animals, and such trace fossil evidence of past life as tracks or plant imprints. Ancient marine sediments may contain invertebrate fossils such as snails, clam and oyster shells, sponges, and protozoa; and vertebrate fossils such as fish, whale, and sea lion bones. Contractor acknowledges and understands that excavation or removal of paleontological material is prohibited by law and constitutes a misdemeanor under California Public Resources Code, Section 5097.5."	
Cumulative Impacts to Geology and Soils: Potential impacts of the proposed project to unknown paleontological resources and unique geologic features, when combined with the impacts of past, present, and reasonably foreseeable projects in the City of West Sacramento, could contribute to a cumulatively significant impact due to the overall loss of paleontological remains unique to the region. However, when resources are assessed and/or protected as they are discovered, impacts to these resources are less than significant. The proposed project could contribute to regional seismic issues; however, compliance with applicable codes and design standards would reduce impacts to a less than significant level.	Potentially Significant Impact.	Refer to **Mitigation Measures GEO-1** and **GEO-2** under Thresholds 4.7.1(ii) and 4.7.6, above.	Less than Significant Impact with Mitigation.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
4.8: GREENHOUSE GAS EMISSIONS			
Threshold 4.8.1: The proposed project is not expected to obstruct the attainment of the State's long-term GHG reduction goal for 2045. The proposed project would be consistent with the City's CAAP and would not generate GHG emissions that may have a significant effect on the environment.	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.
Threshold 4.8.2: The proposed project would not conflict with the regional growth projections and the growth projections used to develop the CARB's 2022 Scoping Plan and the SACOG's 2020 MTP/SCS. As such, the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, including the CARB Scoping Plan and the SACOG's 2020 MTP/SCS.	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.
Cumulative: The proposed project's emissions are estimated to be 4,739.0 MT CO2e per year; however, the YSAQMD has not established a numeric threshold for GHG emissions. As such, the significance of GHG emissions for the proposed project were evaluated based consistency with the regional Climate Action Plan and the City's CAAP. Given that the proposed project is consistent with the applicable goals and CAAP actions, environmental impacts related to GHG emissions and global climate change would not be cumulatively considerable under CEQA. The proposed project, in conjunction with other cumulative projects, would be subject to all applicable regulatory requirements, which would further reduce GHG emissions. Moreover, because GHG impacts are cumulative by nature the project would have a less than significant cumulatively considerable impact.	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.
4.9: HAZARDS AND HAZARDOUS MATERIALS			
Threshold 4.9.1: The proposed project would not create	Less than Significant	No mitigation is required.	Less than Significant

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	Impact.		Impact.
Threshold 4.9.2: The proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	Potentially Significant Impact.	**Mitigation Measure HAZ-1: Implementation of Phase I Environmental Site Assessment (ESA) Recommendations**. The Applicant's Construction Contractor shall implement the following applicable recommendations of the Phase I ESA prepared for the proposed project, as applicable, to the satisfaction of the City's Environmental Compliance Officer or designee. ● A limited subsurface investigation including geophysical survey should be conducted in order to determine the presence or absence of soil, soil vapor, and/or groundwater contamination due to the historical use of the subject property. ● All identified wells and septic tanks should be properly abandoned in accordance with governmental regulations. ● All containers of hazardous substances/petroleum products, waste tires, and debris piles, should be properly removed and disposed of in accordance with governmental regulations The City of West Sacramento's Environmental Compliance Officer, or designee, shall confirm that the recommendations have been implemented into the design and construction of the proposed project prior to the issuance of grading or building permits. **Mitigation Measure HAZ-2: Coordination with the California Department of Conservation's California Geologic Energy Management Division (CalGEM).** Prior to any well work on any oil, gas, or geothermal well, the Project Applicant shall coordinate with CalGEM regarding the identification, testing, and management of any existing or previously abandoned oil, gas, or geothermal wells located within the project site. The	Less than Significant Impact with Mitigation.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
		Applicant shall implement the following measures consistent with CalGEM's requirements under the California Public Resources Code (PRC) and California Code of Regulation (CCR): ● In conformance with CalGEM requirements, the property owner and/or Project Applicant shall obtain all rights necessary to re-abandon any wells and shall be responsible for the costs of re-abandonment. ● If any wells require abandonment or re-abandonment, the Project Applicant shall submit a Notice of Intention (NOI) to CalGEM through WellSTAR and obtain written approval prior to beginning work. ● Well casings shall be cut off at a depth of at least 5 feet, but no more than 10 feet below finished grade, in compliance with CCR Section 1723.5. Any modifications to meet this standard shall be performed only with a CalGEM permit. ● The Project Applicant shall ensure that future property owners are informed of (a) the existence of all wells on the property and (b) potential issues associated with development near oil or gas wells. ● Any soil containing hydrocarbons discovered during development shall be handled and disposed of in accordance with local, state, and federal laws, and appropriate authorities shall be notified if significant amounts are found. The City's Environmental Compliance Officer, or designee, shall verify that all of the above measures have been implemented prior to issuance of grading or building permits. Refer to **Regulatory Compliance Measure WQ-1** in Section 4.10, Hydrology and Water Quality, under Threshold 4.10.1.	
Threshold 4.9.3: The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	No Impact.	No mitigation is required.	No Impact.
Threshold 4.9.4: The proposed project would not be	No Impact.	No mitigation is required.	No Impact.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, it would not create a significant hazard to the public or the environment.			
Threshold 4.9.5: The proposed project is not located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, and would not result in a safety hazard or excessive noise for people residing or working in the project area	No Impact.	No mitigation is required.	No Impact.
Threshold 4.9.6: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Less than Significant Impact.	Refer to **Regulatory Compliance Measure TRA-1** in Section 4.18, Transportation, under Threshold 4.17.4.	Less Than Significant Impact.
Threshold 4.9.7: The proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	No Impact.	No mitigation is required.	No Impact.
Cumulative Impacts related to Hazards and Hazardous Materials: The proposed project would not result in a significant contribution to cumulative hazards or hazardous materials impacts.	Potentially Significant Impact.	Refer to **Mitigation Measures HAZ-1** and **HAZ-2** under Threshold 4.9.2. Refer to **Regulatory Compliance Measure WQ-1** in Section 4.10, Hydrology and Water Quality under Threshold 4.10.1. Refer to **Regulatory Compliance Measure TRA-1** in Section 4.18, Transportation, under Threshold 4.17.4.	Less than Significant Impact with Mitigation.
4.10: HYDROLOGY AND WATER QUALITY			
Threshold 4.10.1: Construction of the project could generate pollutants such as sediment, petroleum products, and concrete waste, but compliance with the Construction General Permit, City Municipal Code, and a SWPPP with BMPs would prevent violations of water quality standards. If groundwater dewatering occurs, discharges would be tested and treated under the RWQCB Groundwater Discharge Permit. With these	Potentially Significant Impact.	**Regulatory Compliance Measure WQ-1: Construction General Permit and Chapter 13.10 of the City of West Sacramento Municipal Code.** Prior to commencement of construction activities, the Project Applicant shall obtain coverage under the State Water Resource Control Board's (SWRCB) *National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities*, *NPDES No. CAS000002, Order No.*	Less than Significant Impact with Mitigation.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
regulatory compliance measures, construction and operational water quality impacts would be less than significant.		*2022-0057-DWQ* (Construction General Permit), or any other subsequent permit. This shall include submission of Permit Registration Documents (PRDs), including permit application fees, a Notice of Intent (NOI), a risk assessment, a site plan, a Storm Water Pollution Prevention Plan (SWPPP), a signed certification statement, and any other compliance-related documents required by the permit, to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTS). Construction activities shall not commence until a Waste Discharge Identification Number (WDID) is obtained for the project from the SMARTS and provided to the Director of the City of West Sacramento Public Works Department, or designee, to demonstrate that coverage under the Construction General Permit has been obtained and the project is in compliance with Chapter 13.10 of the City of West Sacramento Municipal Code. Project construction shall comply with all applicable requirements specified in the Construction General Permit, including but not limited to, preparation of a SWPPP and implementation of construction site Best Management Practices (BMPs) to address all construction-related activities, equipment, and materials that have the potential to impact water quality for the appropriate risk level identified for the Project. The SWPPP shall identify the sources of pollutants that may affect the quality of storm water and shall include BMPs (e.g., Sediment Control, Erosion Control, and Good Housekeeping BMPs) to control the pollutants in storm water runoff. Upon completion of construction activities and stabilization of the project site, a Notice of Termination (NOT) shall be submitted via SMARTS. **Regulatory Compliance Measure WQ-2: Groundwater Discharge Permit.** At least 45 days prior to dewatering activities, the Construction Contractor shall submit an NOI to the Central Valley Regional Water Quality Control Board (RWQCB) to obtain coverage under the *Central Valley Regional*	

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
		Water Quality Control Board National Pollutant Discharge Elimination System (NPDES) CAG995002 Order R5-2022-0006-02 for WDRs Limited Threat Discharges to Surface Water. Groundwater dewatering activities shall comply with all applicable provisions in the Groundwater Discharge Permit, including water sampling, analysis, treatment (if required), and reporting of dewatering-related discharges. Upon completion of groundwater dewatering activities, a NOT shall be submitted to the Central Valley RWQCB. **Regulatory Compliance Measure WQ-3: Phase II MS4 Permit, City of West Sacramento Stormwater Management Program (SWMP) Planning Document, and Section 15.14.060 of the City's Municipal Code.** Prior to issuance of a grading permit, the Project Applicant shall submit a Final Post-Construction Standard Plan Worksheet to the City of West Sacramento Public Works Director or designee for review and approval. The Final Post-Construction Standard Plan Worksheet shall specify the BMPs to be incorporated into the proposed project design to target pollutants of concern in runoff from the project site. The Final Post-Construction Standard Plan Worksheet shall also incorporate the results of the final hydrology and hydraulic analyses to demonstrate that the detention facilities meet the requirements of the *National Pollutant Discharge Elimination System (NPDES) Permit and WDRs) for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4s), Order Water Quality (WQ) No. 2013-00010-WQ, NPDES No. CAS000004, as amended by Order WQ Nos. 2015-0133-EXEC, 2016-0069-EXE, 2017- 0031-DWQ, 2018-0001-EXEC, 2018-0007-EXEC, and 2019-0009-EXEC* (Phase II MS4 Permit). The City Public Works Director, or designee, shall ensure that the BMPs specified in the Final Post-Construction Standard Plan Worksheet are incorporated into the final project design.	

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
		Mitigation Measure WQ-1: Back-Up Stormwater Pump. In order to reduce the potential for water quality and localized flooding impact in the event that the proposed stormwater pump fails, the Project Applicant shall design, install, and maintain a backup stormwater pump capable of operating in the event of primary pump failure or power loss. The backup system shall include one or more of the following, as appropriate: a redundant pump of equal capacity, an emergency power supply (e.g., generator or battery backup), or an automatically activated secondary pumping system. The backup pump shall be designed to provide sufficient capacity to manage peak design storm flows in accordance with applicable local, State, and federal stormwater and flood management standards. Verification of backup pump installation and operational readiness shall be provided to the City of West Sacramento prior to issuance of a certificate of occupancy, and the system shall be maintained by Reclamation District RD No. 900 (RD 900) for the life of the project.	
Threshold 4.10.2: Temporary dewatering during construction could occur but would be negligible compared to available groundwater storage in the Yolo Subbasin. During operation, the project would not use groundwater for supply, and recharge would continue through the Sacramento River. Therefore, the project would not substantially deplete groundwater or interfere with recharge, and impacts would be less than significant.	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.
Threshold 4.10.3(i): Construction activities could temporarily expose soils and increase erosion potential, but compliance with the Construction General Permit and SWPPP BMPs would control sediment. During operation, landscaped areas and LID features would stabilize soils and minimize runoff. Impacts related to erosion or siltation would be less than significant.	Less than Significant Impact.	Refer to **Regulatory Compliance Measures WQ-1 and WQ-3** under Threshold 4.10.1.	Less than Significant Impact.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
Threshold 4.10.3(ii): The project would substantially increase impervious surfaces, which would increase the rate and volume of stormwater runoff. The site is also located within the Sacramento River floodplain, where levee deficiencies remain and modeled flood depths could reach 9 to 15 feet in the event of a levee failure. These conditions create the potential for on- or off-site flooding and for flood flows to be impeded or redirected if not properly managed.	Potentially Significant Impact.	Refer to **Mitigation Measure WQ-1** and **Regulatory Compliance Measures WQ-1 and WQ-3** under Threshold 4.10.1.	Less than Significant Impact with Mitigation.
Threshold 4.10.3(iii): Stormwater generated by the project would be conveyed to on-site drainage facilities and a detention basin, but increased runoff volumes could exceed the capacity of downstream storm drain infrastructure along Marshall Road and the Bridgeway Lakes detention facility. In addition, construction and operational activities could introduce pollutants such as oils, grease, fertilizers, and trash into stormwater runoff, creating the potential for substantial additional pollutant loading to the drainage system.	Potentially Significant Impact.	Refer to **Mitigation Measure WQ-1** and **Regulatory Compliance Measures WQ-1 and WQ-3** under Threshold 4.10.1.	Less than Significant Impact with Mitigation.
Threshold 4.10.3(iv): Although the project site is not located within a 100-year flood plain, as designated by FEMA, according to floodplain mapping in the Sacramento-San Joaquin Valley compiled by the DWR pursuant to Senate Bil (SB) 5, portions of the project site are within the 200-year flood plain. In addition, modeled flood inundation depths of a hypothetical levee failure of the Sacramento River South Levee provided in the City's General Plan EIR indicate that the project site would be inundated with between 9 and 15 feet of water. As such, development of the proposed project could impede or redirect flood flows in the event of levee failure.	Less Than Significant Impact.	**Regulatory Compliance Measure WQ-4: Chapter 15.50 of the City's Municipal Code.** Prior to the issuance of any grading or building permit, the Project Applicant shall demonstrate compliance with Chapter 15.50 of the City's Municipal Code, 200 Year Flood Protection. Compliance with this municipal code requirement shall be demonstrated by completing one of the following: 1. The construction of flood management improvements or other mitigation measures, beyond those set forth in City's Floodplain Management Ordinance (Title 18 of the Municipal Code). The floodplain administrator shall review the design and sufficiency of any such improvements or mitigation measures and may approve, conditionally approve, or disapprove proposed improvements and measures. 2. The payment to the City of an "in-lieu" flood management	Less than Significant Impact.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
		fee in an amount established by resolution of the city council. In-lieu flood management fees shall be paid at the time of issuance of building permits.	
Threshold 4.10.4: The project site is located within the natural floodplain of the Sacramento River and could be inundated in the event of a levee failure, which would also increase the risk of pollutant release from residential land uses. Although the site is not susceptible to tsunami, seiche, or dam failure due to its inland location and distance from large, enclosed water bodies, the floodplain setting creates a potential hazard that must be addressed.	Potentially Significant Impact.	Refer to **Regulatory Compliance Measures WQ-1 through WQ-4** under Thresholds 4.10.1 and 4.10.3(iv).	Significant and Unavoidable Impact.
Threshold 4.10.5: The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	Less than Significant Impact.	Refer to **Regulatory Compliance Measures WQ-1 through WQ-3** under Threshold 4.10.1.	Less than Significant Impact.
Cumulative Impact related to Hydrology and Water Quality: The proposed project and other related projects would comply with applicable NPDES and City requirements, therefore, cumulative hydrology and water quality impacts would be less than significant. Therefore, the proposed project's incremental hydrology and water quality impacts would not be cumulatively considerable.	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.
4.11: LAND USE AND PLANNING			
Threshold 4.11.1: The proposed project would not physically divide an established community.	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.
Threshold 4.11.2: The proposed project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.
Cumulative Impacts to Land Use and Planning: The proposed project's contribution to cumulative impacts	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
associated with land use and planning would be less than significant.			
4.12: MINERAL RESOURCES			
Threshold 4.12.1: The proposed project would not result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state.	No Impact.	No mitigation is required.	No Impact.
Threshold 4.12.2: The proposed project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.	No Impact.	No mitigation is required.	No Impact.
Cumulative Impacts to Mineral Resources: The proposed project's contribution to cumulative impacts associated to mineral resources would be less than significant.	Less Than Significant Impact.	No mitigation is required.	Less Than Significant Impact.
4.13: NOISE			
Threshold 4.13.1: Project construction would generate short-term noise from equipment, grading, and worker/haul trips, with composite levels at the nearest residences predicted at about 64 dBA L_{eq} during daytime hours. These levels would remain below the 80 dBA L_{eq} construction noise criterion established by the FTA, and construction would be limited to daytime hours. Long-term operational noise from project traffic, HVAC units, and on-site activities would also comply with City standards; therefore, construction and operational noise impacts would be less than significant.	Potentially Significant Impact.	**Mitigation Measure NOI-1: Construction Hours.** The City or construction contractor shall implement the following measures at the project site: ● Construction activities shall only occur between the hours of 7:00 a.m. and 7:00 p.m. on Monday through Saturday. ● No construction activity shall occur on Sundays or City-recognized holidays without a written exemption by the Chief Building Official or his/her designee.	Less than Significant Impact with Mitigation.
Threshold 4.13.2: Construction of the proposed project would generate ground-borne vibration from heavy equipment such as bulldozers, but predicted levels at the nearest residences (about 42 VdB) would remain well below the Federal Transit Admiration's (FTA's) thresholds for human annoyance of 65 VdB Similarly, vibration levels at the closest structures would	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
experience a vibration level of up to 0.244 PPV in/sec and would not exceed the Caltrans' vibration damage threshold of 0.30 PPV in/sec. Therefore, both construction and long-term operational vibration impacts would be less than significant.			
Threshold 4.13.3: The closest airport to the project site is approximately 4 miles northwest of Sacramento Executive Airport and approximately 10.4 miles south of Sacramento International Airport. The noise contour boundaries of the Sacramento Executive Airport show that the project site is located well outside of the 65 dBA CNEL contour line, therefore, this impact would be less than significant.	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.
Cumulative Impacts to Noise and Vibration: The proposed project's contribution to cumulative impacts associated with noise and vibration would be less than significant.	Potentially Significant Impact.	Refer to **Mitigation Measure NOI-1** under Threshold 4.13.1.	Less than Significant Impact with Mitigation.
4.14: POPULATION AND HOUSING			
Threshold 4.14.1: The proposed project would not induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.
Threshold 4.14.2: The proposed project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.	No Impact.	No mitigation is required.	No Impact.
Cumulative Impacts to Population and Housing: The proposed project's contribution to cumulative impacts associated with population, housing, and employment growth would be less than significant.	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
4.15: PUBLIC SERVICES			
Threshold 4.15.1(i): The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection.	Less than Significant Impact.	**Regulatory Compliance Measure PS-1: Payment of Fire Facilities Development Fees.** In accordance with Chapter 12.42 of the City of West Sacramento Municipal Code, prior to the issuance of building permits, the Project Applicant shall pay the most current Fire Facilities Development Fee for residential development, as calculated by the City. Building permits will be issued only after the City has received proof of payment of the required fee. Refer to **Regulatory Compliance Measure TRA-1** in Section 4.17, Transportation, under Threshold 4.17.2.	Less than Significant Impact.
Threshold 4.15.1(ii): The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection.	Less than Significant Impact.	**Regulatory Compliance Measure PS-2: Payment of Police Facilities Development Fees.** In accordance with Chapter 12.40 of the City of West Sacramento Municipal Code, prior to the issuance of building permits, the Project Applicant shall pay the most current Police Facilities Development Fee for residential development, as calculated by the City. Building permits will be issued only after the City has received proof of payment of the required fee. Refer to **Regulatory Compliance Measure TRA-1** in Section 4.17, Transportation, under Threshold 4.17.2.	Less than Significant Impact.
Threshold 4.15.1(iii): The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools.	Less than Significant Impact.	**Regulatory Compliance Measure PS-3: Payment of School Impact Fees.** In accordance with Chapter 3.16 of the City of West Sacramento Municipal Code, and pursuant to Section 65995 of the California Government Code, prior to issuance of any building permits, the Project Applicant shall provide proof to the Director of the City of West Sacramento Community Development Department, or designee, that payment of the most current School Impact Fee for residential development, as calculated by the City, has been made. Building permits will be issued only after the City has received proof of payment of the required fee.	Less than Significant Impact.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
Threshold 4.15.1(iv): The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks.	Less than Significant Impact.	**Regulatory Compliance Measure PS-4: Payment of Park Facility Development Fees.** In accordance with Chapter 12.30 of the City of West Sacramento Municipal Code, prior to issuance of any building permits, Project Applicant shall provide proof to the Director of the City of West Sacramento Community Development Department, or designee, that payment of the most current Park Facility Development Fee for residential development, as calculated by the City, has been made. Building permits will be issued only after the City has received proof of payment of the required fee.	Less than Significant Impact.
Threshold 4.15.1(v): The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities.	Less than Significant Impact.	**Regulatory Compliance Measure PS-5: Payment of City Hall Facilities Development Fees.** In accordance with Chapter 12.48 of the City of West Sacramento Municipal Code, prior to issuance of any building permits, the developer or Project Applicant shall provide proof to the Director of the City of West Sacramento Community Development Department, or designee, that payment of the most current City Hall Facilities Development Fee for residential development, as calculated by the City, has been made. Building permits will be issued only after the City has received proof of payment of the required fee.	Less than Significant Impact.
Cumulative Impacts to Public Services: The proposed project's potential impacts to fire services, police protection, school services, public libraries, and public transportation are not cumulatively considerable.	Less than Significant Impact.	Refer to **Regulatory Compliance Measures PS-1 through PS-5** under Thresholds 4.15.1(i) through 4.15.1(v).	Less than Significant Impact.
4.16: RECREATION			
Threshold 4.16.1: The proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	Less than Significant Impact.	Refer to **Regulatory Compliance Measure PS-4** in Section 4.15, Public Services, under Threshold 4.15.1(iv).	Less than Significant Impact.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
Threshold 4.16.2: The proposed project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.
Cumulative Impacts to Recreational Resources: The proposed project's potential impacts to recreational resources are not cumulatively considerable.	Less than Significant Impact.	Refer to **Regulatory Compliance Measure PS-4** in Section 4.15, Public Services, under Threshold 4.15.1(iv).	Less than Significant Impact.
4.17: TRANSPORTATION			
Threshold 4.17.1: Although the proposed project would result in an increase in potential bicyclists and pedestrians in the general area, the estimated volumes would not significantly impact existing facilities. In addition, the proposed project would provide pedestrian and bicycle facilities within the development, as well as frontage improvements, including sidewalks, along the north side of Marshall Road and the west side of Otis Avenue. Therefore, the proposed project would be consistent with the City's Mobility Element goals for bicycle and pedestrian facilities, including Goal M-1, Goal M-2, Goal M-5, and Goal M-6. In addition, the proposed project would not require new or expanded transit service, nor would it affect existing or planned transit routes, service frequencies, or policies identified in the City's General Plan	Less Than Significant Impact.	No mitigation is required.	Less than Significant.
Threshold 4.17.2: The proposed project would generate a VMT per capita of 20.88, which is higher than both the City's 85 percent residential VMT per capita threshold (16.43) and the regional threshold (17.43). While project design features and VMT measures were proposed to reduce this VMT impact. These measures would only achieve an approximate 3.03 percent reduction in VMT. Therefore, the proposed project would result in a significant and unavoidable transportation impact related to VMT.	Potentially Significant Impact.	No feasible mitigation.	Significant and Unavoidable Impact

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
Threshold 4.17.3: The proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.
Threshold 4.17.4: The proposed project would not result in inadequate emergency access.	Less than Significant Impact.	**Regulatory Compliance Measure TRA-1: Transportation Management Plan**. The construction contractor shall prepare and implement a Transportation Management Plan (TMP) during construction of the proposed project. The Draft TMP shall be reviewed and approved by the Director of the City of West Sacramento Engineering Department, or designee, prior to the initiation of construction. The TMP shall be prepared consistent with the recommendations of the *California Temporary Traffic Control Handbook* and shall include provisions to maintain traffic flow along Marshall Road, Otis Avenue, safe access into and out of the project site, and emergency access to the project site and adjacent areas during construction.	Less than Significant Impact.
Cumulative Impacts to Transportation: The proposed project would result in significant and unavoidable impacts related VMT which would contribute to significant and unavoidable cumulative transportation and traffic impacts.	Potentially Significant Impact.	No feasible mitigation measures.	Significant and Unavoidable Impact.
4.18: TRIBAL CULTURAL RESOURCES			
Threshold 4.18.1(a): The proposed project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).	Potentially Significant Impact.	**Mitigation Measure TCR-1: Workers Environmental Awareness Program (WEAP).** Prior to any ground-disturbing activities (including, but not limited to, clearing, grubbing, tree and bush removal, grading, trenching, fence post replacement and removal, construction excavation, excavation for all utility and irrigation lines, and landscaping phases of any kind), and prior to the issuance of grading permits, the Applicant or contractor shall retain a tribal representative, as assigned by the consulting tribe(s). The Tribal Representative shall conduct a WEAP and Tribal Cultural Resource Sensitivity Training for all construction personnel and monitors who are not trained	Less Than Significant Impact with Mitigation.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
		archaeologists. In attendance shall be designated archaeologists. The training session shall focus on the TCRs that may be encountered during ground-disturbing activities as well as the procedures to be followed in the event of an unanticipated discovery. A basic presentation shall be prepared and presented by the Tribal Representative to inform all personnel working on the Project about the cultural sensitivity of the area. The purpose of the WEAP training is to provide specific details on the kinds of cultural materials that may be identified during construction of the Project and explain the importance of and legal basis for the protection of significant TCRs. Each worker shall also learn the proper procedures to follow in the event that TCRs or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the on-call archaeologist and if appropriate, Tribal representative. Necessity of training attendance shall be stated on all construction plans. **Mitigation Measure TCR-2: Archaeological Monitoring**. Prior to any ground disturbance, including site clearing, building demolition, grading and trenching, the Project Applicant or their contractor shall ensure that a qualified archaeologist and a tribal monitor is present to monitor earthmoving activities. If any archaeological resource of Native American origin or association or tribal cultural resource (TCR) (i.e., sites, features, or artifacts) are exposed during ground-disturbing activities all construction occurring within 100 feet of the find shall immediately stop until the tribal monitor, determines if the find is a TCR, evaluates the significance of the find, and determine whether or not additional study is warranted. Temporary flagging or staking may be required around the resource to avoid any disturbance from construction	

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
		equipment. The work exclusion buffer may be adjusted based on the recommendation of the Tribal Monitor. The feasibility of avoidance and preservation in place of any identified TCR shall be evaluated prior to considering other management strategies that may be implemented. Significant resource sites shall be subject to appropriate measures (e.g., impact avoidance, preservation in place, recordation). Appropriate treatment of TCRs may include but is not limited to: ● Recordation of the resource(s) ● Avoidance and preservation of the resource(s) Recovery and reburial of the resource(s) onsite or in a feasible off-site location in a designated area subject to no future disturbance. The location of the reburial shall be acceptable to the tribe(s). If the tribal monitor identifies a potential TCR, additional efforts such as preparation of a treatment plan or testing, may be warranted prior to allowing construction to proceed in this area. Any data recovery shall be consulted on and agreed upon by the tribe(s). All management strategies recommended by the designated tribal representative and/or Tribal Historic Preservation Officer (THPO) shall be approved by the City of West Sacramento Community Development Director. The Project Applicant or their contractor shall then adhere to the management strategies approved by the City. Ground-disturbing activities may resume once the management strategies have been implemented to the satisfaction of th**e City's Community Development Director and the tribe(s).** **Mitigation Measure TCR-3: Inadvertent Discovery of United Auburn Indian Community Resources.** If any suspected tribal cultural resources (TCRs) or resources of cultural significance to the United Auburn Indian Community, including but not limited to features, anthropogenic/ cultural soils, cultural belongings or	

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
		objects (artifacts), shell, bone, shaped stones or bone, or ash/charcoal deposits are discovered by any person during construction activities including ground disturbing activities, all work shall pause immediately within 100 feet of the find, or an agreed upon distance based on the project area and nature of the find. Work shall cease in and within the immediate vicinity of the find regardless of whether the construction is being actively monitored by a Tribal Monitor, cultural resources specialist, or professional archaeologist. A Tribal Representative and the Lead Agency shall be immediately notified, and the Tribal Representative in coordination with the Lead Agency shall determine if the find is a TCR (PRC Section 21074) and the Tribal Representative shall make recommendations for further evaluation and treatment, as necessary. **Mitigation Measure TCR-4:Yocha Dehe Wintun Nation Treatment Protocol**. i. <u>Cultural Affiliation</u> The Yocha Dehe Wintun Nation ("Tribe") traditionally occupied lands in Yolo, Solano, Lake, Colusa and Napa Counties. The Tribe has designated its Cultural Resources Committee ("Committee") to act on the Tribe's behalf with respect to the provisions of this Protocol. Any human remains which are found in conjunction with Projects on lands culturally-affiliated with the Tribe shall be treated in accordance with Section III of this Protocol. Any other cultural resources shall be treated in accordance with Section IV of this Protocol. ii. <u>Inadvertent Discovery of Native American Human Remains</u> Whenever Native American human remains are found during the course of a Project, the determination of Most Likely Descendant ("MLD") under California Public	

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
		Resources Code Section 5097.98 will be made by the Native American Heritage Commission ("NAHC") upon notification to the NAHC of the discovery of said remains at a Project site. If the location of the site and the history and prehistory of the area is culturally-affiliated with the Tribe, the NAHC contacts the Tribe; a Tribal member will be designated by the Tribe to consult with the landowner and/or project proponents. Should the NAHC determine that a member of an Indian tribe other than Yocha Dehe Wintun Nation is the MLD, and the Tribe is in agreement with this determination, the terms of this Protocol relating to the treatment of such Native American human remains shall not be applicable; however, that situation is very unlikely. iii. <u>Treatment of Native American Remains</u> In the event that Native American human remains are found during development of a Project and the Tribe or a member of the Tribe is determined to be MLD pursuant to Section II of this Protocol, the following provisions shall apply. The Medical Examiner shall immediately be notified, ground disturbing activities in that location shall cease and the Tribe shall be allowed, pursuant to California Public Resources Code Section 5097.98(a), to (1) inspect the site of the discovery and (2) make determinations as to how the human remains and grave goods should be treated and disposed of with appropriate dignity. The Tribe shall complete its inspection and make its MLD recommendation within forty-eight (48) hours of getting access to the site. The Tribe shall have the final determination as to the disposition and treatment of human remains and grave goods. Said determination may include avoidance of the human remains, reburial	

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
		on-site, or reburial on tribal or other lands that will not be disturbed in the future. The Tribe may wish to rebury said human remains and grave goods or ceremonial and cultural items on or near the site of their discovery, in an area which will not be subject to future disturbances over a prolonged period of time. Reburial of human remains shall be accomplished in compliance with the California Public Resources Code Sections 5097.98(a) and (b). The term "human remains" encompasses more than human bones because the Tribe's traditions call for the burial of associated cultural items with the deceased (funerary objects), and/or the ceremonial burning of Native American human remains, funerary objects, grave goods and animals. Ashes, soils and other remnants of these burning ceremonies, as well as associated funerary objects and unassociated funerary objects buried with or found near the Native American remains are to be treated in the same manner as bones or bone fragments that remain intact. iv. <u>Non-Disclosure of Location of Reburials</u> Unless otherwise required by law, the site of any reburial of Native American human remains shall not be disclosed and will not be governed by public disclosure requirements of the California Public Records Act, Cal. Govt. Code § 6250 et seq. The Medical Examiner shall withhold public disclosure of information related to such reburial pursuant to the specific exemption set forth in California Government Code Section 6254(r). The Tribe will require that the location for reburial is recorded with the California Historic Resources Inventory System ("CHRIS") on a form that is acceptable to the CHRIS center. The Tribe may also suggest that the landowner	

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
		enter into an agreement regarding the confidentiality of site information that will run with title on the property. v. <u>Treatment of Cultural Resources</u> Treatment of all cultural items, including ceremonial items and archeological items will reflect the religious beliefs, customs, and practices of the Tribe. All cultural items, including ceremonial items and archeological items, which may be found at a Project site should be turned over to the Tribe for appropriate treatment, unless otherwise ordered by a court or agency of competent jurisdiction. The Project Proponent should waive any and all claims to ownership of Tribal ceremonial and cultural items, including archeological items, which may be found on a Project site in favor of the Tribe. If any intermediary, (for example, an archaeologist retained by the Project Proponent) is necessary, said entity or individual shall not possess those items for longer than is reasonably necessary, as determined solely by the Tribe. vi. <u>Inadvertent Discoveries</u> If additional significant sites or sites not identified as significant in a Project environmental review process, but later determined to be significant, are located within a Project impact area, such sites will be subjected to further archeological and cultural significance evaluation by the Project Proponent, the Lead Agency, and the Tribe to determine if additional mitigation measures are necessary to treat sites in a culturally appropriate manner consistent with CEQA requirements for mitigation of impacts to cultural resources. If there are human remains present that have been identified as Native American, all work will cease for a period of up to 30 days in accordance with Federal Law.	

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
		Mitigation Measure TCR-5: Yocha Dehe Wintun Nation Tribal Monitors Protocol. i. Preferred Treatment The preferred protocol upon the discovery of Native American human remains is to (1) secure the area, (2) cover any exposed human remains or other cultural items, and (3) avoid further disturbances in the area. ii. Comportment All parties to the action are strongly advised to treat the remains with appropriate dignity, as provided in Public Resource Code Section 5097.98. We further recommend that all parties to the action treat tribal representatives and the event itself with appropriate respect. For example, jokes and antics pertaining to the remains or other inappropriate behavior are ill advised. iii. Excavation Methods If, after the Yocha Dehe Tribal representative has been granted access to the site and it is determined that avoidance is not feasible, an examination of the human remains will be conducted to confirm they are human and to determine the position, posture, and orientation of the remains. At this point, we recommend the following procedures: a. Tools. All excavation in the vicinity of the human remains will be conducted using fine hand tools and fine brushes to sweep loose dirt free from the exposure. b. Extent of Exposure. In order to determine the nature and extent of the grave and its contents, controlled excavation should extend to a full buffer zone around the perimeter of the remains.	

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
		c. Perimeter Balk. To initiate the exposure, a perimeter balk (especially, a shallow trench) should be excavated, representing a reasonable buffer a minimum of 10 cm around the maximum extent of the known skeletal remains, with attention to counter-intuitive discoveries or unanticipated finds relating to this or other remains. The dirt from the perimeter balk should be bucketed, distinctly labeled, and screened for cultural materials. d. Exposure Methods. Excavation should then proceed inward from the walls of the balk as well as downward from the surface of the exposure. Loose dirt should be scooped out and brushed off into a dustpan or other collective device. Considerable care should be given to ensure that human remains are not further impacted by the process of excavation. e. Provenience. Buckets, collection bags, notes, and tags should be fully labeled per provenience, and a distinction should be made between samples collected from: (1) Perimeter Balk (described above), (2) Exposure (dirt removed in exposing the exterior/burial plan and associations, and (3) Matrix (dirt from the interstices between bones or associations). Thus, each burial may have three bags, "Burial 1 Perimeter Balk," "Burial 1 Exposure Balk," "Burial 1 Matrix." Please note the provisions below with respect to handling and conveyance of records and samples. f. Records. The following records should be compiled in the field: (1) a detailed scale drawing of the burial, including the provenience of and full for all human remains, associated artifacts, and the configuration of	

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
		all associated phenomena such as burial pits, evidence for preinterment grave pit burning, soil variability, and intrusive disturbance, (2) complete a formal burial record using the consultants proprietary form or other standard form providing information on site #, unit or other proveniences, level depth, depth and location of the burial from a fixed datum, workers, date(s), artifact list, skeletal inventory, and other pertinent observations, (3) crew chief and worker field notes that may supplement or supersede information contained in the burial recording form, and (4) photographs, including either or standard photography or high-quality (400-500 DPI or 10 MP recommended) digital imaging. g. Stipulations for Acquisition and Use of Imagery. Photographs and images may be used only for showing location or configuration of questionable formation or for the position of the skeleton. They are not to be duplicated for publication unless a written release is obtained from the Tribe. h. Association. Association between the remains and other cultural materials should be determined in the field in consultation with an authorized Tribal representative, and may be amended per laboratory findings. Records of provenience and sample labels should be adequate to determine association or degree of likelihood of association of human remains and other cultural materials. i. Samples. For each burial, all Perimeter Balk soil is to be 1/8”-screened. All Exposure soil is to be 1/8”-screened, and a minimum of one 5-gallon bucket of excavated but unscreened Exposure soil is to be collected, placed in a plastic garbage bag in the	

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
		bucket. All Matrix soil is to be carefully excavated, screened as appropriate, and then collected in plastic bags placed in 5-gallon buckets. j. Human remains are not to be cleaned in the field. k. <u>Blessings.</u> Prior to any physical action related to human remains, a designated tribal representative will conduct prayers and blessings over the remains. The archaeological consultant will be responsible for insuring that individuals and tools involved in the action are available for traditional blessings and prayers, as necessary. iv. <u>Lab Procedures</u> No laboratory studies are permitted without consultation with the tribe. Lab methods are determined on a project-specific basis in consultation with Yocha Dehe Wintun Nation representatives. The following procedures are recommended: a. <u>Responsibility.</u> The primary archaeological consultant will be responsible for insuring that all lab procedures follow stipulations made by the Tribe. b. <u>Blessings</u>. Prior to any laboratory activities related to the remains, a designated tribal representative will conduct prayers and blessings over the remains. The archaeological consultant will be responsible for insuring that individuals and tools involved in the action are available for traditional blessings and prayers, as necessary. c. <u>Physical Proximity of Associations.</u> To the extent possible, all remains, associations, samples, and original records are to be kept together throughout the laboratory process. In particular, Matrix dirt is to	

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
		be kept in buckets and will accompany the remains to the lab. The primary archaeological consultant will be responsible for copying all field records and images, and insuring that the original notes and records accompany the remains throughout the process. d. <u>Additional Lab Finds.</u> Laboratory study should be done making every effort to identify unanticipated finds or materials missed in the field, such as objects encased in dirt or human remains misidentified as faunal remains in the field. In the event of discovery of additional remains, materials, and other associations the tribal representatives are to be contacted immediately. v. <u>Re-internment without Further Disturbance</u> No laboratory studies are permitted on human remains and funerary objects. The preferred treatment preference for exhumed Native American human remains is reburial in an area not subject to further disturbance. Any objects associated with remains will be reinterred with the remains. vi. <u>Curation of Recovered Materials</u> Should all, or a sample, of any archaeological materials collected during the data recovery activities – with the exception of Human Remains – need to be curated, an inventory and location information of the curation facility shall be given to tribe for our records. Refer to **Mitigation Measure CUL-1** and **Regulatory Compliance Measure CUL-1** in Section 4.5, Cultural Resources, under Threshold 4.5.2 and 4.5.3.	

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
Threshold 4.18.1(b): The proposed project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.	Potentially Significant Impact.	Refer to **Mitigation Measures TCR-1** through **TCR-5** under Threshold 4.18.1. Refer to **Mitigation Measure CUL-1** and **Regulatory Compliance Measure CUL-1** in Section 4.5, Cultural Resources, under Thresholds 4.5.2 and 4.5.3.	Less Than Significant Impact with Mitigation.
Cumulative Impacts to Tribal Cultural Resources: The proposed project's contribution to cumulative tribal cultural resource impacts would be less than significant.	Potentially Significant Impact.	Refer to **Mitigation Measures TCR-1 through TCR-5** under Threshold 4.18.1. Refer to **Mitigation Measure CUL-1 and Regulatory Compliance Measure CUL-1** in Section 4.5, Cultural Resources, under Thresholds 4.5.2 and 4.5.3.	Less Than Significant Impact.
4.19: UTILITIES AND SERVICE SYSTEMS			
Threshold 4.19.1: The proposed project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.	Less than Significant Impact.	Refer to **Regulatory Compliance Measure WQ-3** in Section 4.10, Hydrology and Water Quality, under Threshold 4.10.1.	Less than Significant Impact.
Threshold 4.19.2: The proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
Threshold 4.19.3: The proposed project would result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.
Threshold 4.19.4: The proposed project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.
Threshold 4.19.5: The proposed project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste.	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.
Cumulative Impacts to Utilities and Service Systems: The proposed project's potential impacts to wastewater, portable water, solid waste, electricity, natural gas, and telecommunications services are not cumulatively considerable.	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.
4.20: WILDFIRE			
Threshold 4.20.1: Implementation of the proposed project would increase the number of vehicles accessing the project site via the four full-access driveways off Marshall Road (one at Martinique Street and one at Jamaica Street) and two located off Otis Avenue (one at D Street and one at F Street) and would generate an increase in the amount and volume of traffic on local and regional roadway networks. However, in accordance with the California Fire Code, the proposed project would include the design, construction, and maintenance of structures, roadways, and facilities to maintain appropriate emergency/evacuation access throughout the project site.	Less than Significant Impact.	Refer to **Regulatory Compliance Measure TRA-1**, under Threshold 4.17.3. above.	Less than Significant Impact.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
Threshold 4.20.2: The project site is not located in a VHFHSZ or in an SRA. Although the proposed project would change the land use designation from Rural Estates (RE) to Low-Density Residential (LR) and rezone the site from Residential Rural Estates (RE) to Residential One Family (R-1-A), allowing the subdivision of approximately 60 acres into 259 single-family residential lots, 15 open space lots, and supporting infrastructure, this change would not exacerbate wildfire risks. Compliance with applicable building and fire codes, combined with existing water infrastructure to support fire suppression, would further ensure that new residential uses are not exposed to significant wildfire hazards. Accordingly, the proposed land use changes would not exacerbate wildfire risk or expose project occupants to significant wildfire-related hazards, including pollutant concentrations from smoke or uncontrolled wildfire spread. Impacts would be less than significant, and no mitigation is required.	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.
Threshold 4.20.3: The installation of all project-related utility improvements would be implemented in an urbanized setting in accordance with the current California Building Code, California Fire Code, and applicable local ordinances, impacts related to the installation or maintenance of infrastructure that may exacerbate fire risk or result in temporary or ongoing impacts to the environment would be less than significant. As such, the proposed project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation

Potential Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance With Mitigation
Threshold 4.20.4: The proposed project would not expose people or structures to significant risks, including downslope or landslides, as a result of runoff post-fire slope instability, or drainage changes. However, according to the City's General Plan EIR and modeled flood inundation areas for the 200-year flooding event, portions of the project site would be inundated during a 200-year flooding event. In addition, the entire city, including the project site, is within the natural floodplain of the Sacramento River and is surrounded on all sides by a series of levees designed to provide flood protection. The levees channelize the Sacramento River into a fixed alignment by preventing future channel meandering and separating the channel from its historic floodplain.	Less Than Significant Impact.	No mitigation is required.	
Cumulative Impacts to Wildfire: The proposed project and all related projects are required to adhere to City, State, and federal regulations designed to reduce and/or avoid impacts related to wildfire. With compliance with these regulations, cumulative impacts related to wildfire would be less than significant.	Less than Significant Impact.	No mitigation is required.	Less than Significant Impact.

2.0 INTRODUCTION

This Draft Environmental Impact Report (EIR) has been prepared to evaluate environmental impacts associated with the Brar Farms Residential Development Project (proposed project) in West Sacramento, California. The City of West Sacramento (City) is the "public agency which has the principal responsibility for carrying out or approving the project"[1] and, as such, is the "Lead Agency" for the proposed project under the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.). CEQA requires the Lead Agency to consider the information contained in the EIR prior to taking any discretionary action on the proposed project. This Draft EIR is intended to serve as an informational document to be considered by the City and any Responsible Agencies during deliberations on the proposed project. PRC Section 21069 defines a "Responsible Agency" as a public agency other than the Lead Agency that has responsibility for carrying out or approving a project. The approvals and permits associated with the proposed project are detailed in Chapter 3.0, Project Description.

The City, as Lead Agency, determined that the proposed project may have a significant effect on the environment and that an EIR would be required to fully evaluate potential adverse environmental impacts that may result from development of the proposed project. As a result, this EIR has been prepared in accordance with CEQA and the *State CEQA Guidelines* (California Code of Regulations [CCR], Title 14, Section 15000 et seq.). This EIR also complies with the procedures established by the City for the implementation of CEQA.

Questions regarding the preparation of this document and City review of the proposed project should be referred to the following person:

Seamus Laffey, AICP, Senior Planner
City of West Sacramento
1110 West Capitol Avenue, 2nd Floor
West Sacramento, CA 95691
Phone: (916) 617-4645
Email: BrarFarmsEIRcomments@cityofwestsacramento.org

2.1 PURPOSE AND TYPE OF EIR/INTENDED USES OF THE EIR

This EIR has been prepared to evaluate potential environmental impacts that could result from implementation of the proposed project. As the Lead Agency, the City has the principal responsibility for approving the proposed project. In that capacity, the City has decided to prepare this EIR and, after the public review process, will decide whether to certify the Final EIR.

The City and any Responsible Agencies have the authority to make decisions on discretionary actions relating to development of the proposed project. As stated previously, this EIR is intended to serve as an informational document to be considered by the City and Responsible Agencies during deliberations on the proposed project. This EIR evaluates a reasonable worst-case scenario of

[1] As defined in Public Resources Code Section 21067.

potential impacts associated with the proposed project and identifies feasible mitigation and alternatives for any identified potentially significant impacts.

This EIR will serve as a Project EIR pursuant to *State CEQA Guidelines* Section 15161. According to Section 15161 of the *State CEQA Guidelines*, a Project EIR is appropriate for specific development projects and should examine the environmental impacts that could result from all phases of the project, including planning, construction, and operation.

As the Lead Agency for the proposed project under CEQA, the City must consider the information contained in the Final EIR prior to taking any discretionary action with respect to the proposed project. This EIR provides information to the Lead Agency and other public agencies, the general public, and decision-makers regarding the potential environmental impacts from construction and operation of the proposed project. The purpose of the public review of this EIR is to evaluate the adequacy of the environmental analysis in terms of compliance with CEQA. *State CEQA Guidelines* Section 15151 states the following regarding standards from which adequacy is judged:

> An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts. The courts have not looked for perfection but for adequacy, completeness, and a good faith effort at full disclosure.

PRC Section 21002.1(a) states:

> "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided."

An EIR is the most comprehensive form of environmental documentation identified in CEQA and the *State CEQA Guidelines* and provides the information needed to assess the environmental consequences of a proposed project. EIRs are intended to provide an objective, factually supported, full-disclosure analysis of the environmental consequences associated with a proposed project that has the potential to result in significant, adverse environmental impacts.

2.2 PUBLIC REVIEW PROCESS

In compliance with CEQA and the *State CEQA Guidelines,* the City has taken steps to promote opportunities for the public and other public agencies to participate in the environmental review process. The City conducted the scoping process, issued a Notice of Preparation (NOP), and determined that an EIR was required to evaluate the potentially significant environmental effects of the proposed project and related actions. Additionally, a public scoping session was conducted, as discussed below.

2.2.1 Notice of Preparation

On September 10, 2025, an NOP for the proposed project was distributed by the City via the State Clearinghouse (SCH). The SCH issued a project number for this EIR (SCH No. 2025090414). On October 13, 2025, the City extended the review period until October 24, 2025. In accordance with *State CEQA Guidelines* Section 15082, the NOP was circulated to the agencies and individuals listed in **Appendix A** for a minimum period of 30 days (extended to a total of 45 days), during which time written comments were solicited pertaining to environmental issues/topics that this EIR should evaluate. The NOP was also made available for public review at the City's website during the review period. Responses to the NOP were received from the following agencies:

- California Native American Heritage Commission (NAHC)
- California Geologic Energy Management Division (CalGEM)
- Central Valley Regional Water Quality Control Board (RWQCB)
- Sacramento Area Sewer District (SacSewer)

The City received a total of 75 comment letters during the public review period of the NOP. For a copy of the NOP comment letters received, refer to **Appendix A** of this Draft EIR.

2.2.2 Scoping Meeting and Areas of Controversy

The City held a public scoping meeting at The Boathouse at Bridgeway Lakes on Monday October 6, 2025, from 5:30 p.m. to approximately 8:00 p.m., to present the proposed project and to solicit input from interested parties regarding environmental issues that should be addressed in this EIR. The key environmental issues and concerns raised in response to the NOP or at the scoping meeting included:

- Aesthetics
- Air Quality
- Biological Resources
- Geology and Soils
- Greenhouse Gases
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Utilities and Service Systems
- Cumulative

Please note that this is not an exhaustive list of areas of controversy, but rather key issues that were raised during the scoping process, and each topical section of this EIR includes a summary of relevant scoping comments. In addition, this EIR addresses each of these areas of concern or controversy in detail, examines project-related and cumulative environmental impacts, identifies significant adverse environmental impacts, and proposes mitigation measures and/or alternatives designed to reduce or eliminate potentially significant impacts**. Appendix A** to this EIR includes the NOP and copies of written comments received in response to the NOP and a summary of verbal comments received at the Public Scoping Meeting, as well as written comment cards received in response to the public scoping meeting.

2.2.3 EIR Public Review Period

This EIR is being distributed to numerous public agencies and other interested parties for review and comment. This EIR is also available at the following locations and on the City's website:

City of West Sacramento City Hall
1110 W Capitol Avenue
West Sacramento, CA 95691

Arthur F. Turner Community Library
1212 Merkley Avenue
West Sacramento, CA 95691

Website: https://www.cityofwestsacramento.org/government/departments/communitydevelopment/planning-division/major-planning-projects

All comments received from agencies and individuals on this EIR will be accepted during the public comment period, which will not be less than 45 days, in compliance with CEQA and the *State CEQA Guidelines*. All comments on this EIR should be sent to the following City contact person:

Seamus Laffey, AICP, Senior Planner
City of West Sacramento
1110 West Capitol Avenue, 2nd Floor
West Sacramento, CA 95691
Phone: 916-617-4645
Email: BrarFarmsEIRcomments@cityofwestsacramento.org

Following the close of the public comment period, the City will prepare written responses to all written comments received during the public comment period and will compile these comments and responses, together with any text changes to this EIR, into a Final EIR that includes all of the information required pursuant to *State CEQA Guidelines* Section 15132. The Final EIR will be provided to all public agencies that submitted comments on this EIR at least 10 days prior to certification of the Final EIR. The Final EIR shall consist of the EIR or a revision of the draft; comments and recommendations received on the EIR either verbatim or in summary; a list of persons, organizations, and public agencies commenting on the EIR; the response of the City to significant environmental points raised in the review and consultation process and in comments submitted on the Draft EIR; and any other information added by the City.

The City will make findings regarding the extent and nature of the impacts as presented in the Final EIR. The Final EIR must be certified as complete by the City Council prior to making a decision on the requested entitlements for the proposed project. Public input is encouraged at all public hearings regarding the proposed project.

2.3 SCOPE OF THIS EIR

As required by *State CEQA Guidelines* Section 15128, this EIR must identify the effects of the proposed project that are determined to be significant. Environmental topics addressed in this EIR include:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

2.4 FORMAT OF THE EIR

This EIR contains the information and analysis required by CEQA and the *State CEQA Guidelines*, including Sections 15122–15131, and is generally organized as follows:

- **Chapter 1.0: Executive Summary.** Chapter 1.0 contains the Executive Summary of this Draft EIR, which summarizes the proposed project and lists all significant project impacts, feasible mitigation measures that have been recommended to reduce any significant impacts of the proposed project, and the level of significance of each impact following feasible mitigation. The summary is presented in a table format.

- **Chapter 2.0: Introduction.** Chapter 2.0 contains a discussion of the purpose and intended use of this Draft EIR.

- **Chapter 3.0: Project Description.** Chapter 3.0 includes a discussion of the proposed project's geographical setting, the project site's previous uses, and the proposed project's objectives, characteristics, components, and construction phases, as well as the anticipated discretionary and ministerial permits and approvals for the proposed project.

- **Chapter 4.0: Environmental Impact Analysis.** Chapter 4.0 includes an analysis of the proposed project's environmental impacts. It is organized into the following topical sections: aesthetics, agricultural resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service system, and wildfire.

  The environmental setting discussions describe the "existing conditions" of the environment on the project site and in the vicinity of the site as they pertain to the environmental issues being analyzed (*State CEQA Guidelines* Section 15125).

The impact discussions identify and focus on the potentially significant environmental effects of the proposed project. The direct and indirect effects of the proposed project on the environment are identified and described, giving due consideration to both the short-term and long-term effects, as necessary (*State CEQA Guidelines* Section 15126.2[a]).

Chapter 4.0 also includes within the analysis of each environmental topic a discussion of the cumulative effects of the proposed project when considered in combination with other projects causing related impacts, as required by *State CEQA Guidelines* Section 15130. Cumulative impacts are based on the build out of the proposed project and the known relevant approved and proposed projects in the surrounding area.

The discussions of mitigation measures identify and describe feasible measures that could minimize or lessen potentially significant impacts for each significant environmental effect identified in this EIR (*State CEQA Guidelines* Section 15126[e]). The levels of significance before and after mitigation are provided. Significant unavoidable adverse effects are identified where mitigation is not expected to reduce the effects to less than significant levels.

- **Chapter 5.0: Alternatives to the Proposed Project.** In accordance with CEQA, the alternatives discussion in Chapter 5.0 describes a reasonable range of alternatives that could feasibly attain the basic objectives of the proposed project and are capable of eliminating or substantially reducing any of the proposed project's significant unavoidable adverse environmental effects or reducing them to a less than significant level. The alternatives analyzed in Chapter 5.0 include a No Project Alternative, Reduced Density / Rural Buffer Alternative, and a Mixed-Use Alternative.

- **Chapter 6.0: Other CEQA Considerations.** Chapter 6.0 contains discussions on the following topics as required by *State CEQA Guidelines* Section 15126: (1) growth-inducing impacts of the proposed project; and (2) whether there are any significant adverse environmental impacts associated with the proposed project for which either no mitigation or only partial mitigation is feasible.

- **Chapter 7.0: List of Preparers.** Chapter 7.0 provides the organizations and persons contacted during preparation of this Draft EIR, the Draft EIR preparers and technical report authors, and other experts involved in the preparation of this Draft EIR.

- **Chapter 8.0: References.** Chapter 8.0 provides the references used in this Draft EIR.

2.5 INCORPORATION BY REFERENCE

An EIR may incorporate by reference all or portions of another document that is a matter of public record or is generally available to the public, consistent with *State CEQA Guidelines* Section 15150. Informational details from the documents that have been incorporated by reference are summarized in the appropriate sections of this EIR, along with descriptions regarding how the public may review these documents. All documents are available for review at the City of West Sacramento, Planning Division. These documents include:

- City of West Sacramento General Plan (available online at: https://www.cityofwestsacramento.org/government/departments/community-development/planning-division/general-plan-2035)

- City of West Sacramento Municipal Code (available online at: https://ecode360.com/WE5032)

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3.0 PROJECT DESCRIPTION

This chapter describes the Brar Farms Residential Development Project (proposed project) that is the subject of this Draft Environmental Impact Report (EIR) prepared pursuant to the California Environmental Quality Act (CEQA). The proposed project would develop an approximately 60-acre subdivision consisting of 259 lots for future single-family homes and 15 open space lots (including Lot A [detention basin], Lot B [park amenities], Lot C [parklet], Lot D [pump station], and Lots L-1 through L-11 [landscaped lots]). Of the 259 proposed residential lots, 158 would be 5,000 net square feet, 58 would be 6,000 to 7,000 net square feet, 26 would be 7,200 to 8,400 net square feet. Seventeen of the proposed residential lots would be oversized lots reaching up to 14,800 net square feet. In addition, landscaping, roadway, and utility improvements would be installed within the project site. The City of West Sacramento (City) is the Lead Agency for review of the proposed project under CEQA. The following sections provide a description of the proposed project's location, context, background, and objectives, followed by details of the proposed project itself and a summary of required approvals and entitlements.

3.1 PROJECT SITE

The following section describes the proposed project location, existing conditions, surrounding land uses, and regulatory setting.

3.1.1 Project Location

The approximately 60-acre[1] project site is at the corner of Marshall Road and Otis Avenue, within the western portion of West Sacramento in Yolo County. The project site consists of five parcels (Assessor's Parcel Numbers [APNs]: 045-260-008, -009, -010, 045-270-001,-002). **Figure 3-1: Project Location and Regional Vicinity** depicts the project site in a local and regional context.

Local vehicular access to the project site is provided by way of Jefferson Boulevard, Marshall Road, and Southport Parkway. Regional vehicular access to the project site is provided by Interstates 5 and 80 (I-5 and I-80), which are to the east and the north of the project site, respectively. The nearest freeway access is primarily via United States Route 50 (US-50), located at Harbor Boulevard, approximately 2.9 miles north of the project site, which provides a direct connection to I-5 for north-south travel. Freeway access is also provided via Jefferson Boulevard, approximately 3.7 miles northeast of the project site.

Bus stops along Marshall Road and Southport Parkway provide transit service by Yolobus through Route 37 to the project site. The closest bus stops are located at Southport Parkway at Marshall Road, approximately 0.2 mile to the northwest; and Marshall Road at Seymour Avenue, approximately 0.3 mile northeast of the project site.

[1] The combined area of the five parcels that make up the project site totals an actual 58.34 acres, but is rounded up by the tax assessor to 60 acres. Accordingly, the project site is described as approximately 60 acres.

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FIGURE 3-1

Brar Farms Residential Development Project

Project Location and Regional Vicinity

SOURCE: USGS 7.5' Quad - *[Enter quad name] ([Enter quad year])*, CA

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3.1.2 Existing Conditions

The project site is undeveloped and relatively flat with a gentle slope toward the southwest. Site elevations along the property range from approximately 8 to 10 feet above mean sea level. Although the project site primarily consists of loose disced soil from previous tilling activities, small patches of vegetation are present mainly along the northern edge of the site that consist of volunteer weeds and annual grasses.

The project site was the former location of H & H Nishimura Farms and was historically used for agricultural purposes. Eight buildings associated with H & H Nishimura Farms previously stood on the project site but have since been demolished. The project site is currently undeveloped, fully graded, and unoccupied. However, the project site is seasonally farmed for hay by a volunteer farmer and maintained by the property owner, who mows and tills the land as needed.[2]

Pacific Gas and Electric Company (PG&E) transmission lines run along the northern and eastern sides of the project site boundaries. Additionally, an existing drainage ditch runs along approximately 1,000 feet of the western edge of the project site next to the Bridgeway retention pond.

3.1.3 Surrounding Land Uses

The project site is bounded to the north by Marshall Road, to the east by Otis Road and a mix of residential and agricultural uses, to the south by single-family residential uses, and to the west by an existing retention pond that is part of the Bridgeway Lakes Community Park, and the Bridgeway Lakes residential development. **Figure 3-2: Aerial Photograph and Surrounding Land Uses** depicts the project site and surrounding areas.

3.1.4 Project Background and Regulatory Setting

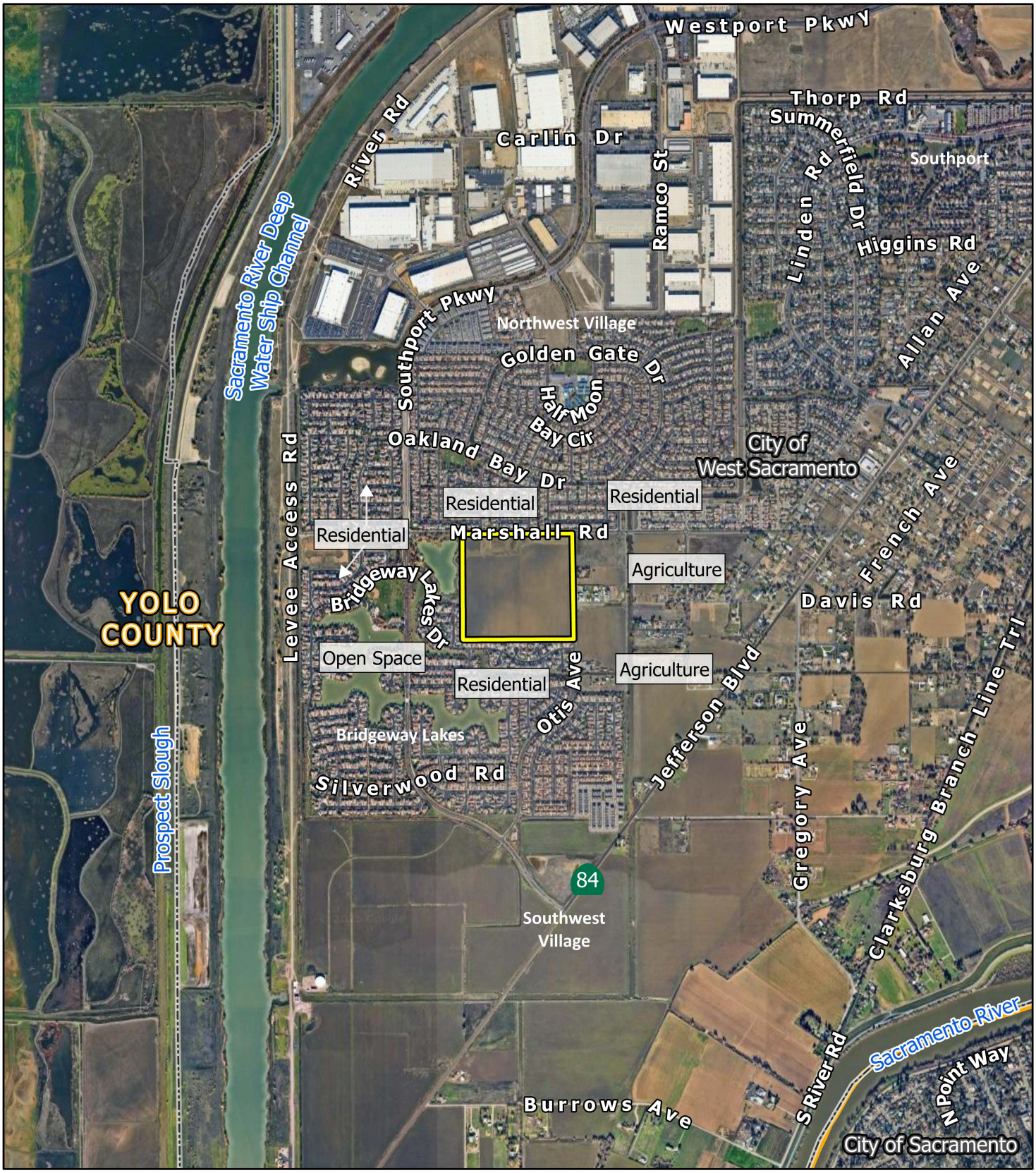
As stated above, the project site was historically used for agricultural purposes dating back to at least 1937 and continued operating as a farm until 2016. Currently, the project site is located within the Southwest Village Boundary of the Southport Framework Plan (State Clearinghouse [SCH] No. 91063032), approved on May 10, 1995,[3] and amended in 1998, which provides a foundation for village-oriented mixed-use developments and is designed to guide the pattern of development to prevent "uncoordinated urban sprawl."

The project site is currently designated as Rural Estate (RE) in both the City's General Plan and the Southport Framework Plan. **Figure 3-3: Existing General Plan Land Use Designations** shows the current General Plan land use for the project site and surrounding area. The RE land use designation is intended for the development of single-family detached homes, secondary residential units, limited agricultural uses, public and quasi-public uses, and similar and compatible uses in a rural setting. The maximum residential density allowed within the RE designation is one dwelling unit

2 Project Applicant. 2025. BI-weekly Meeting. Personal communication with LSA. March 26.

3 City of West Sacramento. 1994. *Southport Framework Plan.* March. Website: https://ceqanet.opr.ca.gov/1991063032/2 (accessed February 2026).

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Project Location
County Boundary
City Boundary

FIGURE 3-2

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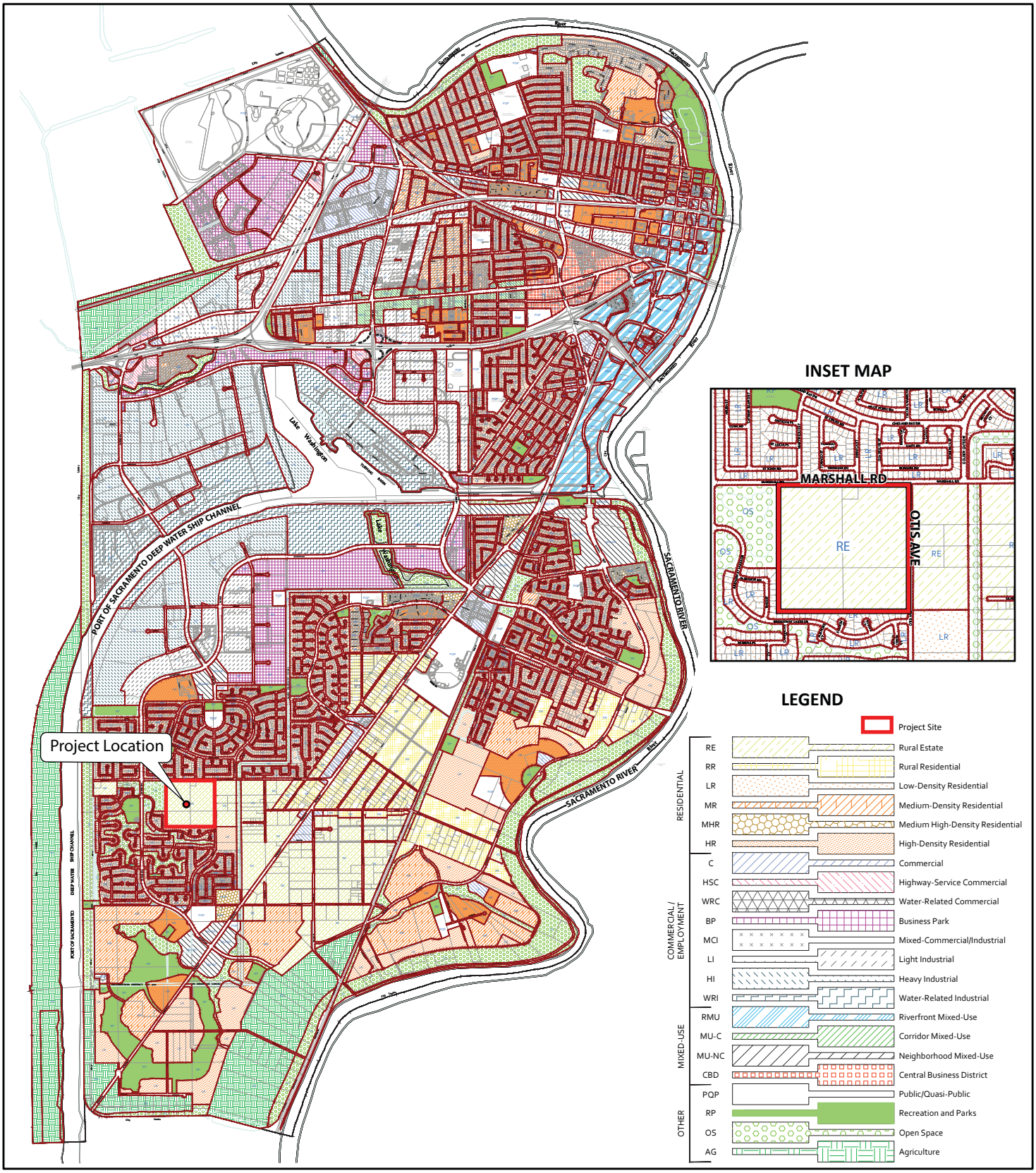
SOURCE: Google Maps (2024)

Brar Farms Residential Development Project

Aerial Photograph and Surrounding Land Uses

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FIGURE 3-3

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SOURCE: General Plan Land Use Diagram, City of West Sacramento

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Brar Farms Residential Development Project

Existing General Plan Land Use Designations

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for every 2.5 acres.[4] The project site is currently zoned as Residential Rural Estates (RE). **Figure 3-4: Existing Zoning** shows the current zoning for the project site and surrounding area.

According to the City's Zoning Code,[5] the RE zoning district is intended to provide for residential development on large lots and provide a transition between agricultural lands and residential designated lands.

The RE zoning district allows for development of up to one residential dwelling unit per 2.5 acres, and allows for detached single-family dwelling units, accessory dwelling units, limited agricultural uses, public and quasi-public uses, and other uses that may be appropriate in a rural residential area.

3.2 PROJECT OBJECTIVES

The following objectives have been established by the Project Applicant for the proposed project:

- To provide a mix of land uses and residential lot sizes with an innovative design approach to residential development.
- To provide open space, green areas, recreational amenities, and multi-use pathways and create an overall design that advances "smart growth"[6] principles.
- To create a development plan that is focused on connectivity within and to adjacent neighborhoods and open spaces.
- To enhance the City's bike and pedestrian network of paths and dedicated bike routes.
- To create a mix of lot sizes and housing types integrated within open space land uses in a functional and logical manner.
- To create a creative approach to sustainable neighborhood design by integrating landscape design and environmental engineering practices into a comprehensive neighborhood plan.
- To provide a sufficient number of new housing units to assist the City in satisfying its Regional Housing Needs Assessment (RHNA) goals.
- To provide a sufficient number of residential units to support necessary improvements to public facilities.

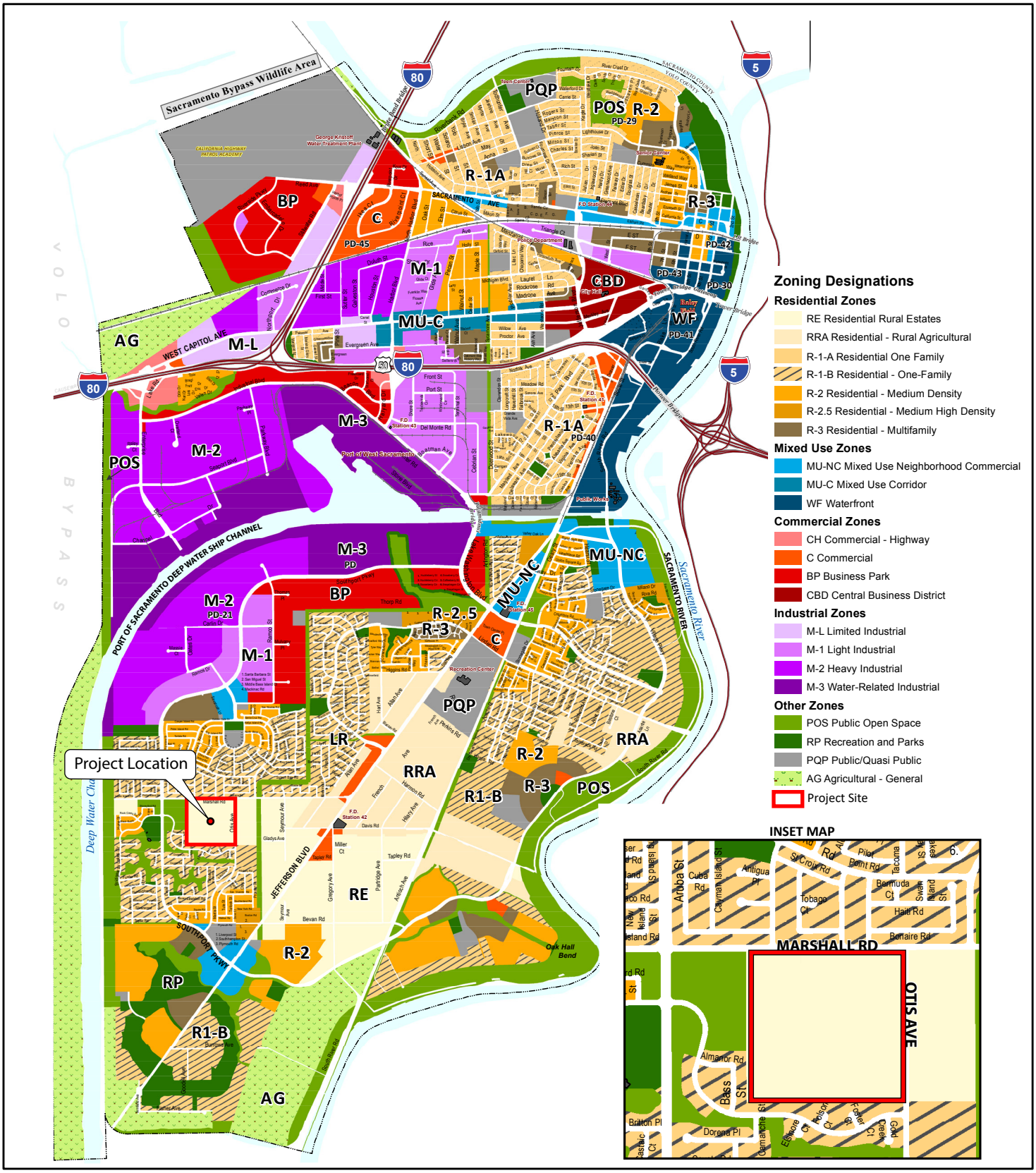
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4 City of West Sacramento. 2024. *General Plan 2035.* January. Website: https://www.cityofwestsacramento.org/home/showpublisheddocument/18212/638421374385370000 (accessed February 2026).

5 City of West Sacramento. 2024. *Code of Ordinances, Zoning Code (Municipal Code Title 17). Chapter 17.08 Residential Zones.* Website: https://www.cityofwestsacramento.org/home/showpublisheddocument/19017/638585485579 370000 (accessed February 2026).

6 Smart growth is an overall approach of development and conservation strategies that can help protect our health and natural environment and make our communities more attractive, economically stronger and resilient to climate change.

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FIGURE 3-4

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MILES

SOURCE: City of West Sacramento, Zoning Map 2016

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Brar Farms Residential Development Project

Existing Zoning

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3.3 PROPOSED PROJECT

The proposed project involves the subdivision of an approximately 60-acre property to create 259 lots for future single-family homes, comprising approximately 34.78 acres of residential development and 15 open space lots totaling 6.65 acres. The open space lots would include a 0.68-acre Central Park, a 0.14-acre parklet at the corner of Marshall Road and Otis Avenue, and 1.81 acres of landscaped lots, including a roundabout, distributed throughout the proposed development to provide greenspace and buffers. Additionally, the open space areas would include a 4.02-acre detention basin, which would also serve as a recreational field during dry seasons.

In addition, the proposed project would require a General Plan Amendment, Southport Framework Plan Amendment, rezoning, a subdivision map, and a Development Agreement (DA) to facilitate proposed development. Individual components of the proposed project are discussed below.

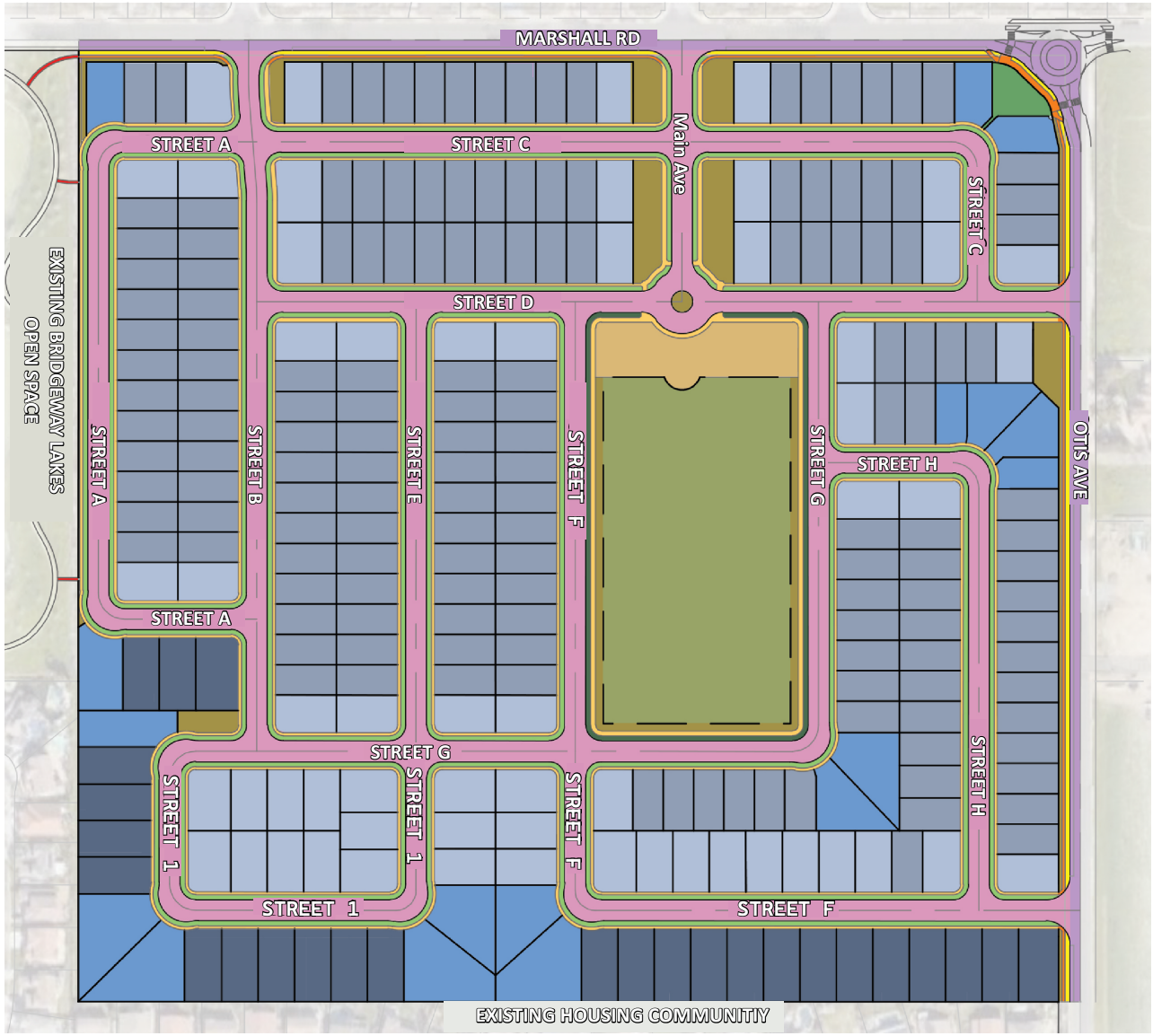
3.3.1 General Plan Amendment and Rezoning

The proposed project would require a General Plan Amendment (GPA) to the City's existing General Plan and an amendment to the Southport Framework Plan to change the designations from RE to Low-Density Residential (LR). It would also require a Zoning Map/Code amendment to rezone the site from RE to Residential One Family (R-1-A). According to the City's General Plan, the LR designation is intended to provide for single-family detached and attached homes, secondary residential units, public and quasi-public uses, and similar compatible uses, allowing a maximum residential density of 6.0 dwelling units per acre (DUA). Additionally, the City's Zoning Code designates the R-1-A zoning district for single-unit dwellings while preserving the characteristics of existing single-unit neighborhoods. The R-1-A zoning district also permits public and quasi-public uses, as well as other compatible uses suited for a low-density residential environment, with allowed residential densities ranging from 1.1 to 6.0 dwelling units per gross acre. As such, these amendments would allow the project to be consistent with the City's Zoning Code and planning documents governing the project site.

3.3.2 Proposed Land Uses and Subdivision

As previously discussed, the proposed project would result in the subdivision of the approximately 60-acre project site, including the City's approval of a subdivision map, and the construction of 259 lots for future single-family homes and 15 open space lots. **Figure 3-5: Proposed Land Uses** depicts the proposed project's land uses, which include internal streets, sidewalks, rights-of-way, 242 residential lots ranging in size from 5,000 to 8,400 net square feet, 17 oversized lots reaching up to 14,800 net square feet, open space and landscaped areas, and infrastructure and drainage zones. **Figure 3-6: Proposed Subdivision Map** and **Figure 3-7: Proposed Site Plan** show the proposed lot configurations and lot sizing.

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Land Use	Key Color	Lots	Acres	Average Density (du/ac)	Average as a % of Total Area
Residential					
50'x100' Lots (Residential R-1-A)		158	18.34	8.61	30.61%
60'x100' & 70'x100' Lots (Residential R-1-A)		58	8.39	6.57	14%
60'x120' & 70'x120'Lots (Residential R-1-A)		26	4.37	5.24	7.3%
Oversized Lots		17	3.68		6.14%
Residential Subtotal		**259**	**34.78**	**7.42**	**58.1%**
Streets					
Residential Collector Street - Marshall Road and Otis Avenue (Street is located within ROW and outside of ROW)(Curb to Centerline)			1.4		2.33%
Residential Local Streets (Curb to Curb)			9.61		16.04%
Street Subtotal			**11.01**		**18.4%**
HOA Maintained - Open Space					
The Central Park (Including pump station)			0.68		1.14%
Parklet			0.14		0.23%
Landscaped Lots & Roundabout			1.81		3.02%
Community Recreation Basin			4.02		6.7%
Separated Sidewalk Planters around Basin and Central Park			0.36		0.6%
Separated Sidewalk Planters Residential Streets			3.56		5.94%
HOA Maintained Sidewalks			2.7		4.51%
HOA Open Space Subtotal			**13.27**		**22.1%**
Publicly Maintained - Open Space					
Separated Sidewalk Planters Marshall Road and Otis Avenue			0.48		0.8%
Publicly Maintained Sidewalk			0.36		0.6%
Public Open Space Subtotal			**0.84**		**1.4%**
Off-site					
Off-site Trail Connections			N/A		
Off-site Subtotal			**N/A**		
Grand Total (Gross Acres)		**259**	**59.9**	**4.32 (gross)**	**100%**

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FIGURE 3-5

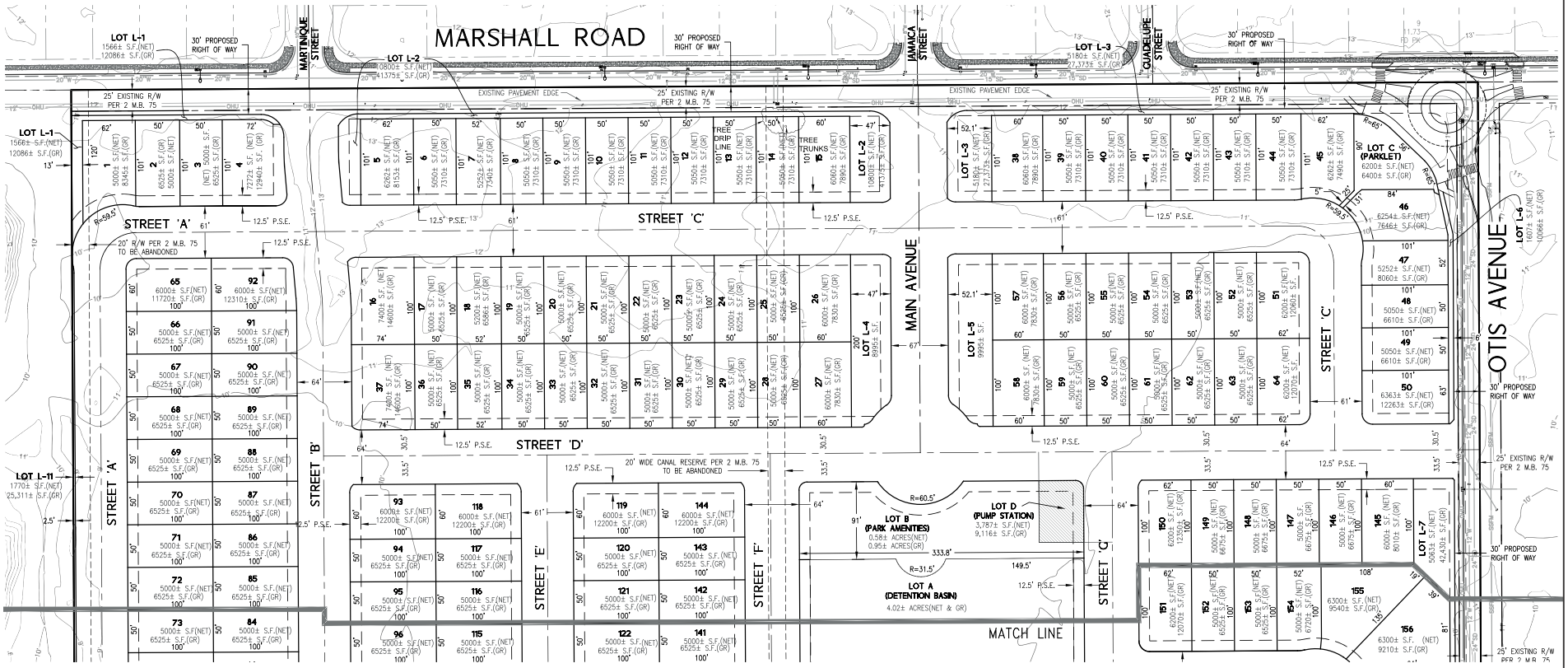
Brar Farms Residential Development Project

Proposed Land Use

SOURCE: City of West Sacramento

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FIGURE 3-6
Page 1 of 2

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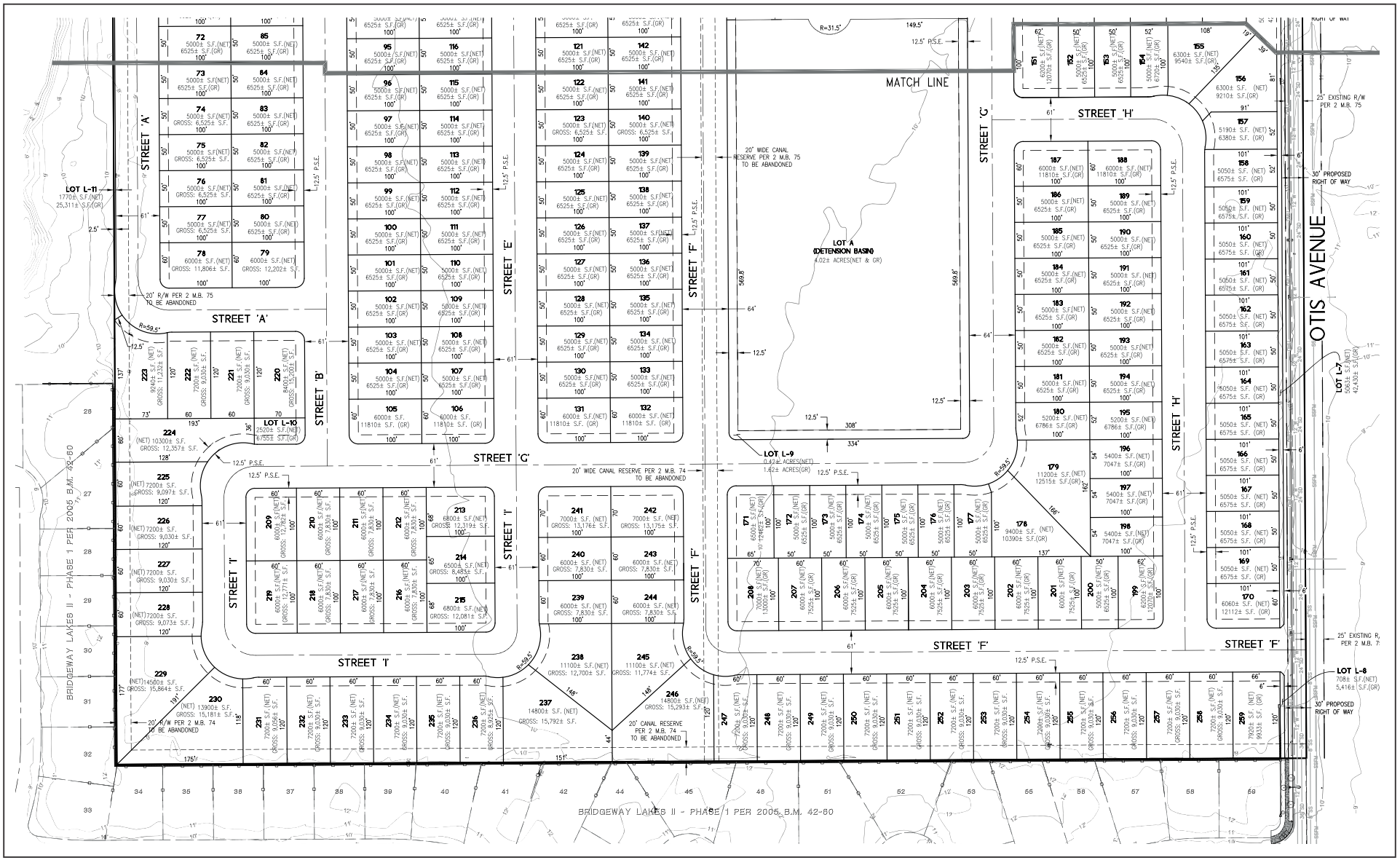
SOURCE: JTS Engineering Consultants, Inc.

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Brar Farms Residential Development Project

Proposed Vesting Subdivision Map

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FIGURE 3-6
Page 2 of 2

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SOURCE: JTS Engineering Consultants, Inc.

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Brar Farms Residential Development Project

Proposed Vesting Subdivision Map

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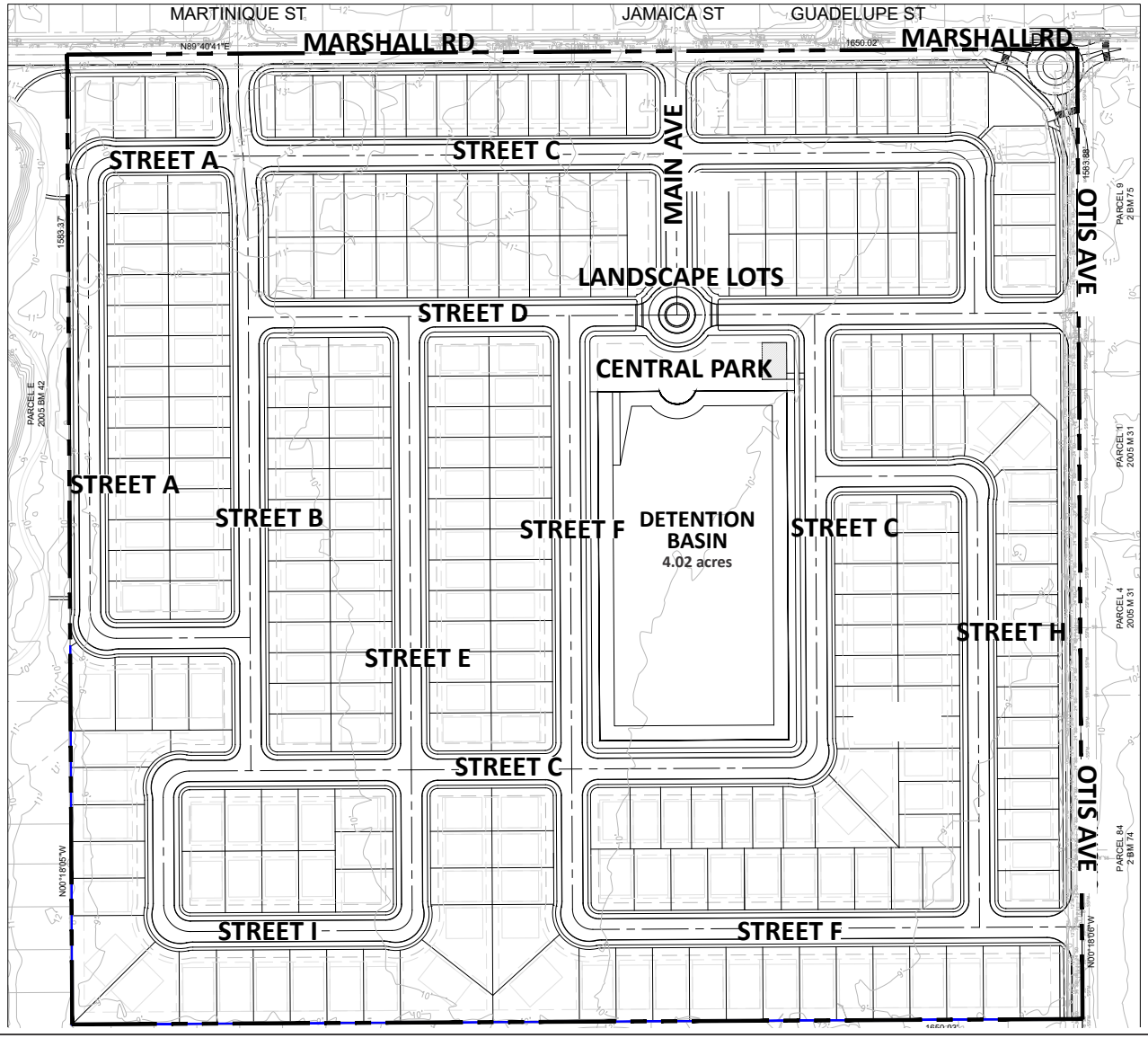


FIGURE 3-7

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Brar Farms Residential Development Project

Proposed Site Plan

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3.3.3 Building Program

The proposed residential development would consist of one- and two-story residential buildings up to 30 feet tall.

As part of the proposed development, two types of residences would be built: the Sohna Residences and the Khote Estates. The Sohna Residences would be the largest "village" within the proposed development, consisting of one- and two-story single-family detached homes situated on lots ranging from 5,000 to 7,000 square feet. These residences would be located adjacent to open space areas, including the Central Park, parklets, landscaped lots, and the detention basin. Setback requirements, as outlined in the design guidelines for the proposed project, would include a 20-foot front yard setback, a 20-foot rear yard setback, a 5-foot interior side yard setback, and a 15-foot corner side yard setback. The maximum building height for the Sohna Residences would be 30 feet.

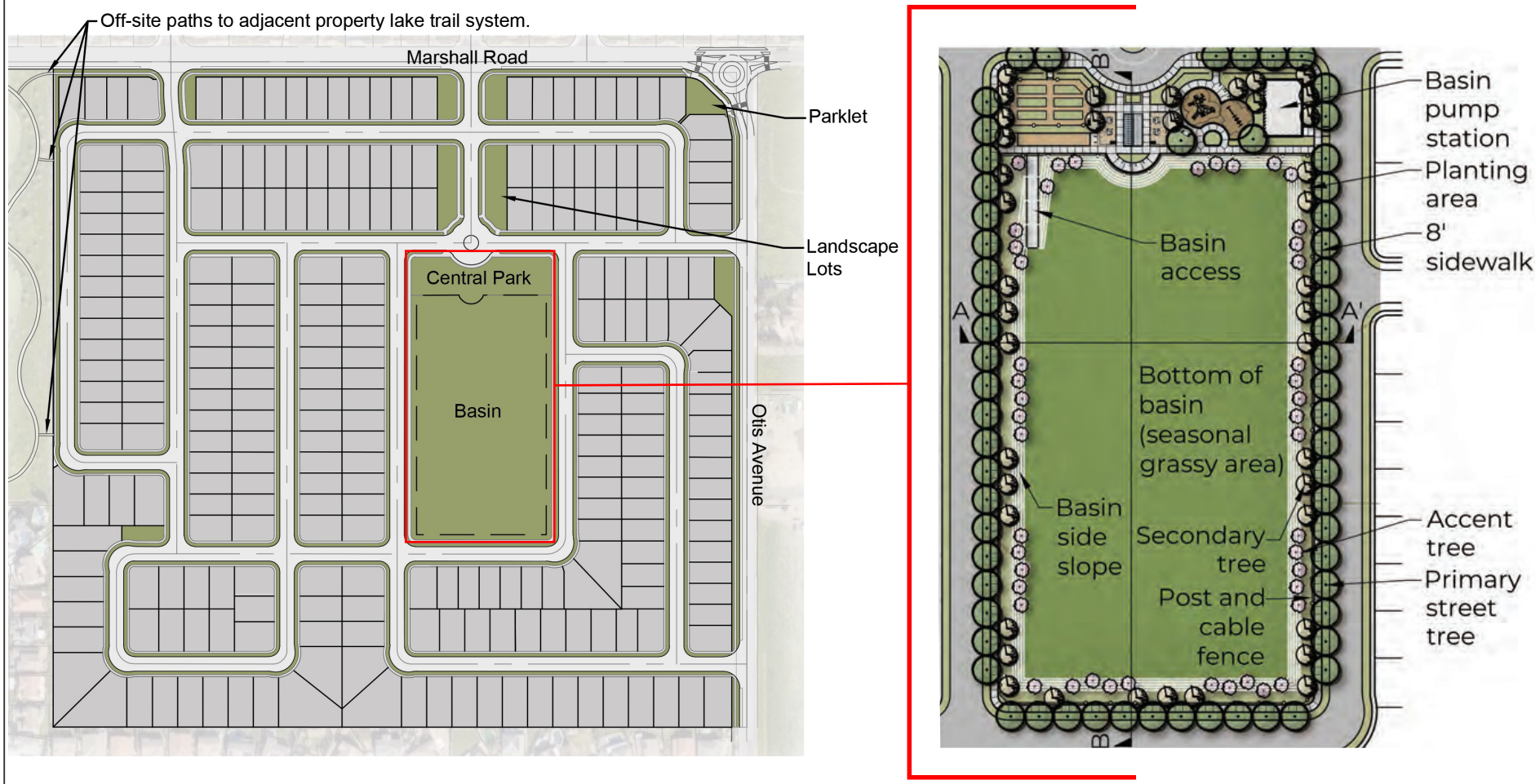
The Khote Estates would be located along the southern and southwestern property lines, adjacent to the existing Bridgeway Lakes community. This residential area would consist entirely of single-story, estate-style detached homes on lots ranging from 7,200 to 14,800 square feet, with a maximum building height of 20 feet. Setback requirements, as outlined in the design guidelines for the proposed project, would include a 20-foot front yard setback, and a 20-foot rear yard setback from the living area. Additionally, interior side yards would have a minimum width of 5 feet, and corner side yards would require a minimum width of 15 feet. The Khote Estates would also incorporate outdoor living areas, with a minimum total size of 120 square feet per lot.

Community walls, community wood fences, and open-view fences would be installed as part of the proposed project. Community walls would be provided along the northern perimeter of the project site adjacent to Marshall Road and along the eastern perimeter adjacent to Otis Avenue to provide safety, privacy, and traffic noise attenuation. Community wood fences would be installed throughout the subdivision to delineate front yards and side and rear property lines of residential lots. Open-view fences would also be installed between residential and open space areas to provide security.

3.3.4 Open Space and Landscaping

The proposed project would include approximately 6.65 acres of open space consisting of the Central Park, parklet, landscape lots, and the detention basin. **Figure 3-8a: Proposed Open Space and Landscaping** and **Figure 3-8b: Proposed Landscaping and Infrastructure** shows the proposed landscaping within the Central Park, parklet, landscaped lots, and detention basin. Additionally, landscaping would be installed throughout the proposed residential component and open space areas. State law prohibits the use of potable water to irrigate nonfunctional turf. However, the proposed 6.65 acres of open space would be designated for communal recreational uses and

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LEGEND

Open Space

FIGURE 3-8a
Page 1 of 3

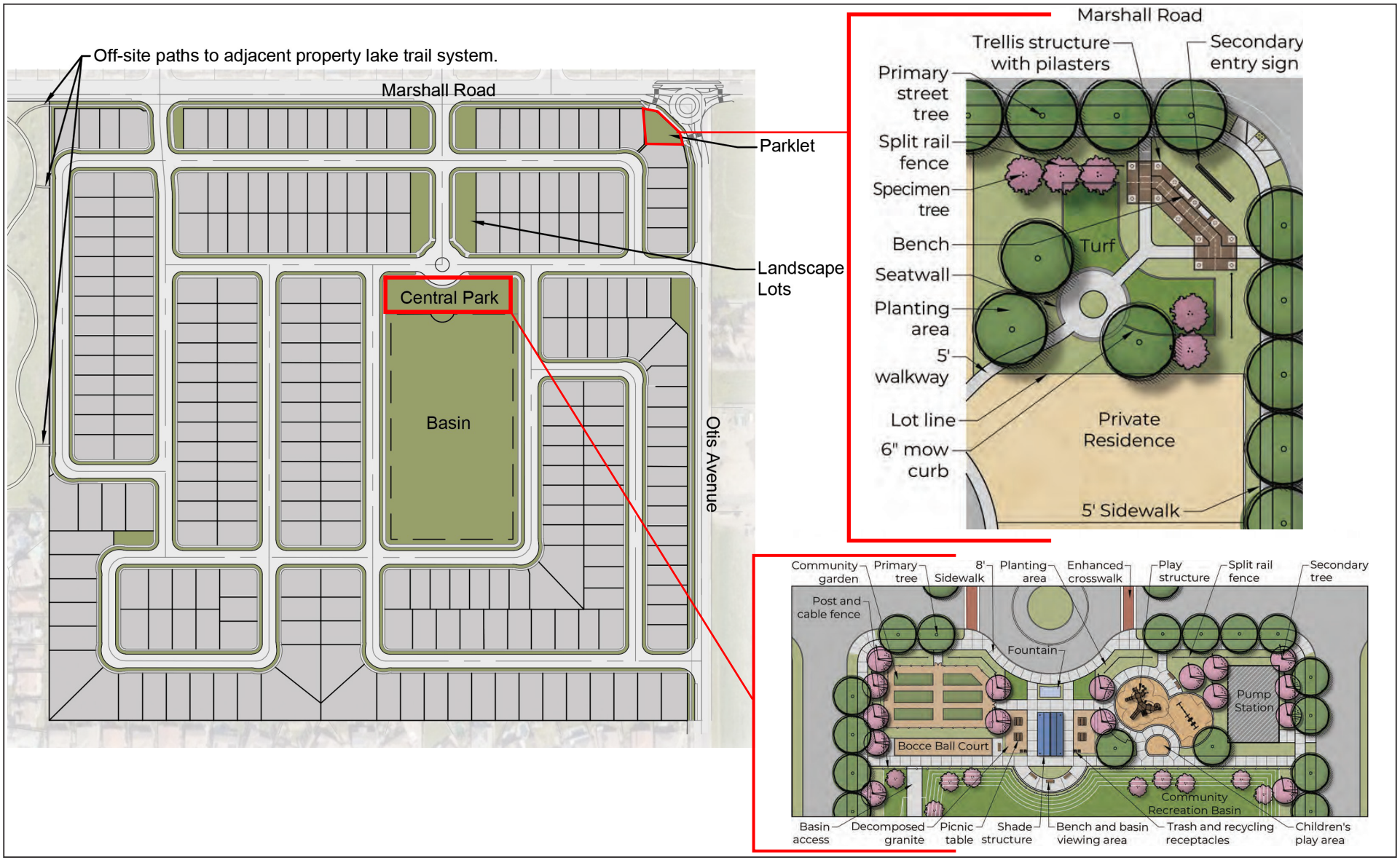
Brar Farms Residential Development Project

Proposed Open Space and Landscaping

SOURCE: HLA Landscape Architects

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LEGEND

Open Space

FIGURE 3-8a
Page 2 of 3

Brar Farms Residential Development Project

Proposed Open Space and Landscaping

SOURCE: HLA Landscape Architects

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Section B-Detention Basin



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FIGURE 3-8a
Page 3 of 3

Brar Farms Residential Development Project
Proposed Open Space and Landscaping

SOURCE: HLA Landscape Architects

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FIGURE 3-8b

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Brar Farms Residential Development Project

Proposed Landscaping and Infrastructure

SOURCE: JTS Engineering

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classified as functional turf.[7] Decorative turf, defined as nonfunctional turf[8] not used for active recreation or community gathering, would be limited to residential lots, where applicable.

The recreational and open space areas within the proposed project, including the recreational elements of the detention basin, park, and landscaped lots would be privately owned and maintained by a future homeowners association (HOA). Reclamation District 900 (RD 900) would maintain the stormwater and drainage components of the detention basin and said maintenance would be funded by the RD 900 property assessments and meet RD 900's standards. Individual open space components are discussed below.

3.3.4.1 Central Park

The 0.68-acre Central Park would be designed as a large community space with a walkway leading to a fountain and a large community shade structure intended for social gatherings, farmers markets, and community events. Consistent with the City of West Sacramento Municipal Code Section 13.04.760, the proposed water fountain would utilize a recirculating water system to reduce water waste and unreasonable water use.[9] The proposed park would also include a children's play area and additional amenities such as sculptures and other art mediums, decorative boulders, table games, picnic tables, and wing benches as well as associated landscaping.

3.3.4.2 Detention Basin

As described above, the 4.02-acre detention basin would serve as both a stormwater detention facility and a seasonal recreational area, designed to collect and manage runoff during wet seasons while providing functional greenspace during dry months. The basin would include post and cable fencing around the perimeter, signage, and associated landscaping.

3.3.4.3 Parklet

The proposed project would include a 0.14-acre parklet that would be comprised of green space and a small gathering area in the northeast corner of the project site, adjacent to a proposed roundabout at the corner of Marshall Road and Otis Avenue. The parklet would include entry monumentation signage and trellis, walkways, benches, and/or turf area. Associated landscaping would also be included within the proposed parklet.

3.3.4.4 Landscaped Lots

The proposed project would include 1.81 acres of landscaped lots, which would be dedicated as open space. These landscaped lots would contain trees, benches, and walkways. These lots would typically be placed next to the corner lots throughout the villages, along Main Avenue. As stated above, the proposed 6.65 acres of open space would be designated for communal recreational uses

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7 Functional turf refers to grassy areas used for communal purposes like parks, playgrounds, sports fields, schools, break areas for employees and other social activities.

8 Nonfunctional turf refers to irrigated lawn that is ornamental and not regularly used for recreation or public gatherings.

9 City of West Sacramento. 2025h. *Zoning Code* (Municipal Code Title 13). Chapter 13.04 Water Service System. Website: https://ecode360.com/43202830 (accessed April 27, 2026).

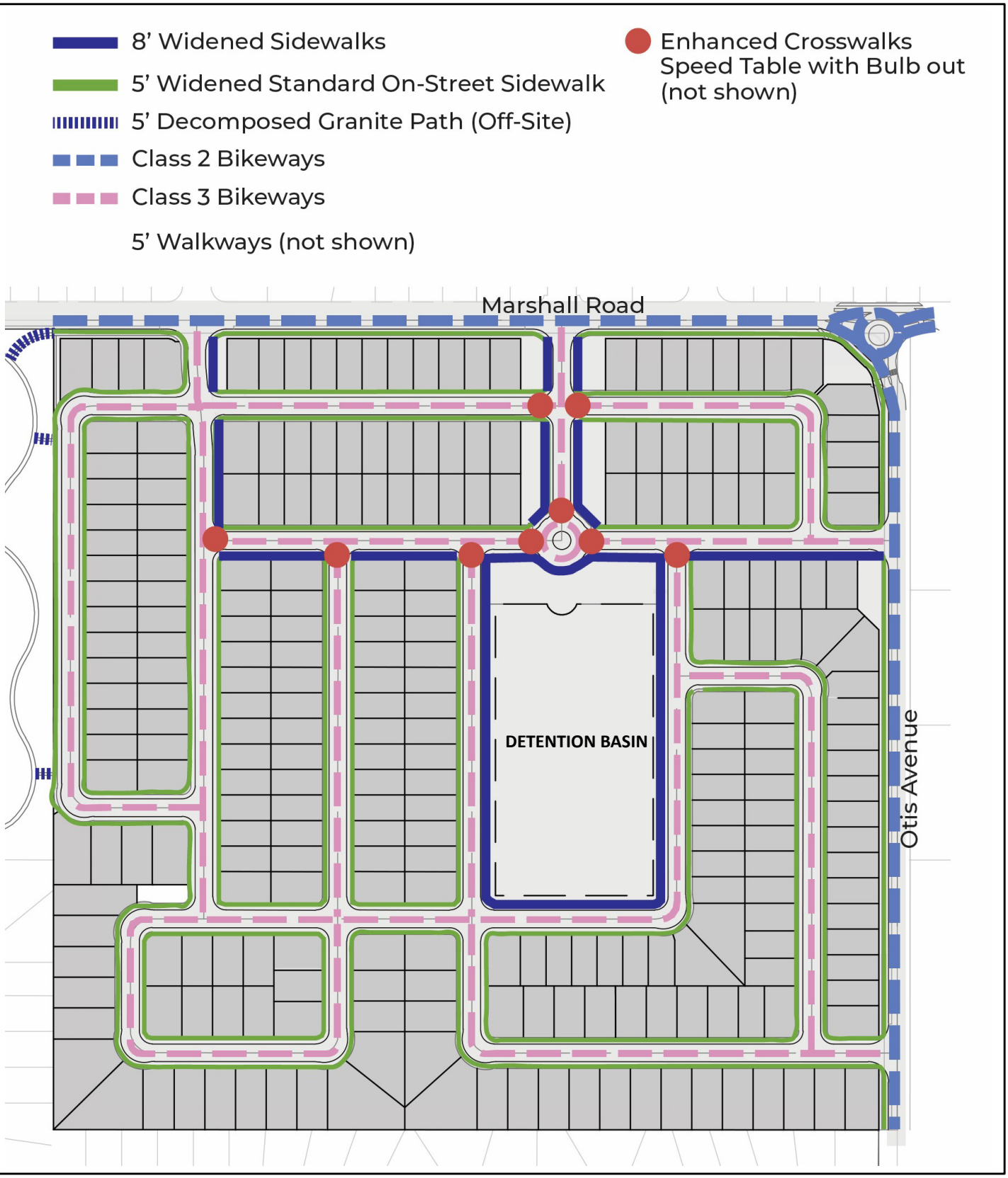
and classified as functional turf. Decorative turf, defined as nonfunctional turf not used for active recreation or community gathering, would be limited to residential lots, where applicable.

3.3.5 Access, Circulation, and Parking

The project site would be connected to the surrounding road network by way of four full-access roads: two off Marshall Road, Main Avenue opposite the intersection with Martinique Street and Street B, opposite the intersection with Jamaica Street; and two off Otis Avenue, Street D, and Street F.[10] The proposed project would include development of local streets to facilitate circulation throughout the proposed residential development, all of which would be public and meet applicable City Standards.

In the northern portion of the project site, Main Avenue, which runs north-south, would serve as a primary street linking Marshall Road to Otis Avenue, by way of Street D, while providing direct access to Streets C and D. Street C would connect to Streets A and B, and Street D would connect to Streets B, E, F, and G. Main Avenue would also include the installation of a traffic circle at Main Avenue and Street D. In the southern portion of the project site, Street I would connect to Streets B and E, and Street H would connect to Streets F and G. **Figure 3-9a: Proposed Circulation Map** and **Figure 3-9b: Proposed Pedestrian and Bicycle Circulation** depicts the circulation plan for the project site. Additionally, the proposed streets would be designed to allow fire truck access as shown in **Figure 3-10: Proposed Fire Truck Access.**

[10] The street names identified in this EIR as part of the proposed project are temporary names. The permanent street names will be determined during the final design and development of the proposed project.



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FIGURE 3-9a

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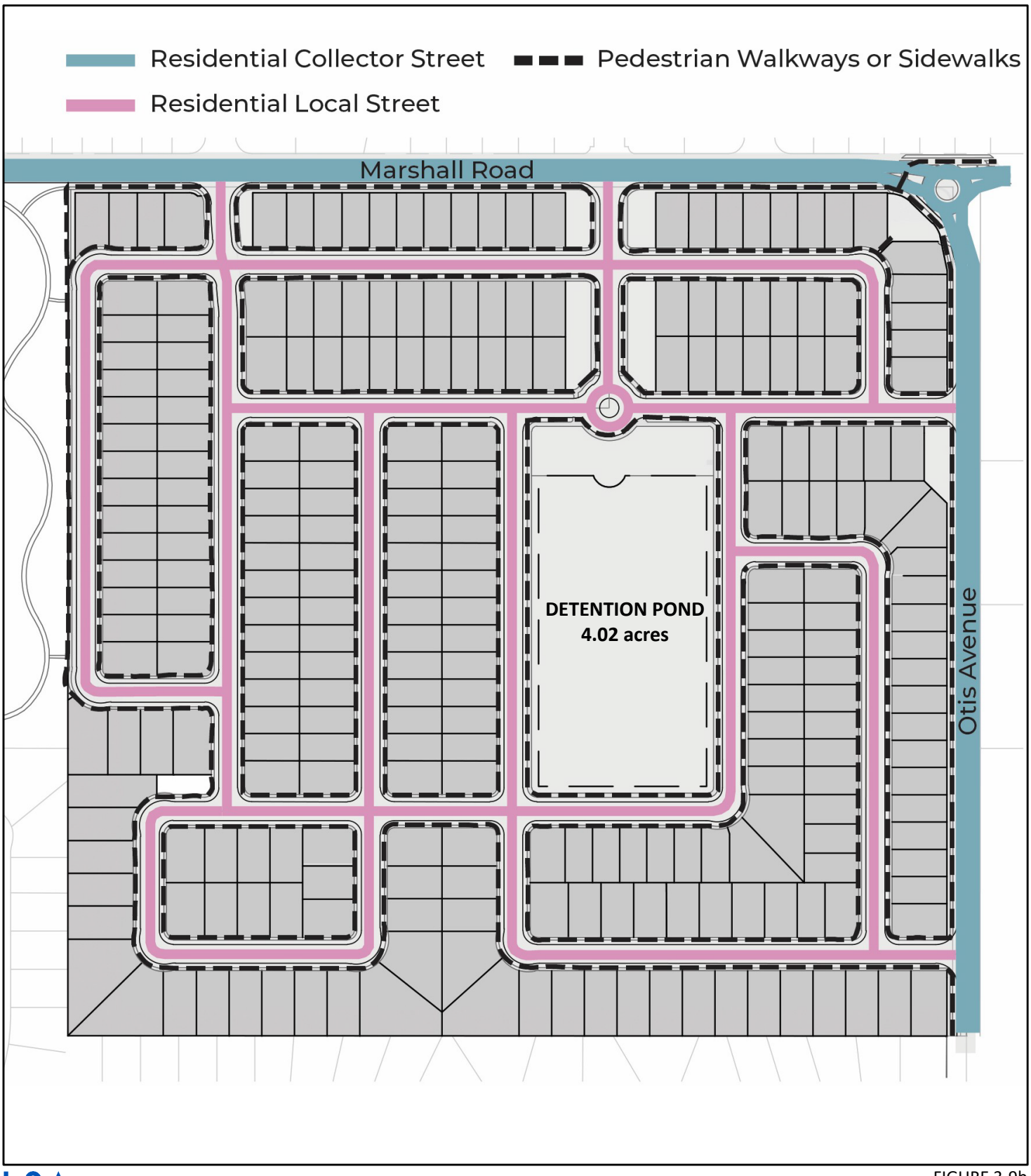
Brar Farms Residential Development Project

Proposed Pedestrian and Bicycle Circulation Map

SOURCE: JTS Engineering

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FIGURE 3-9b

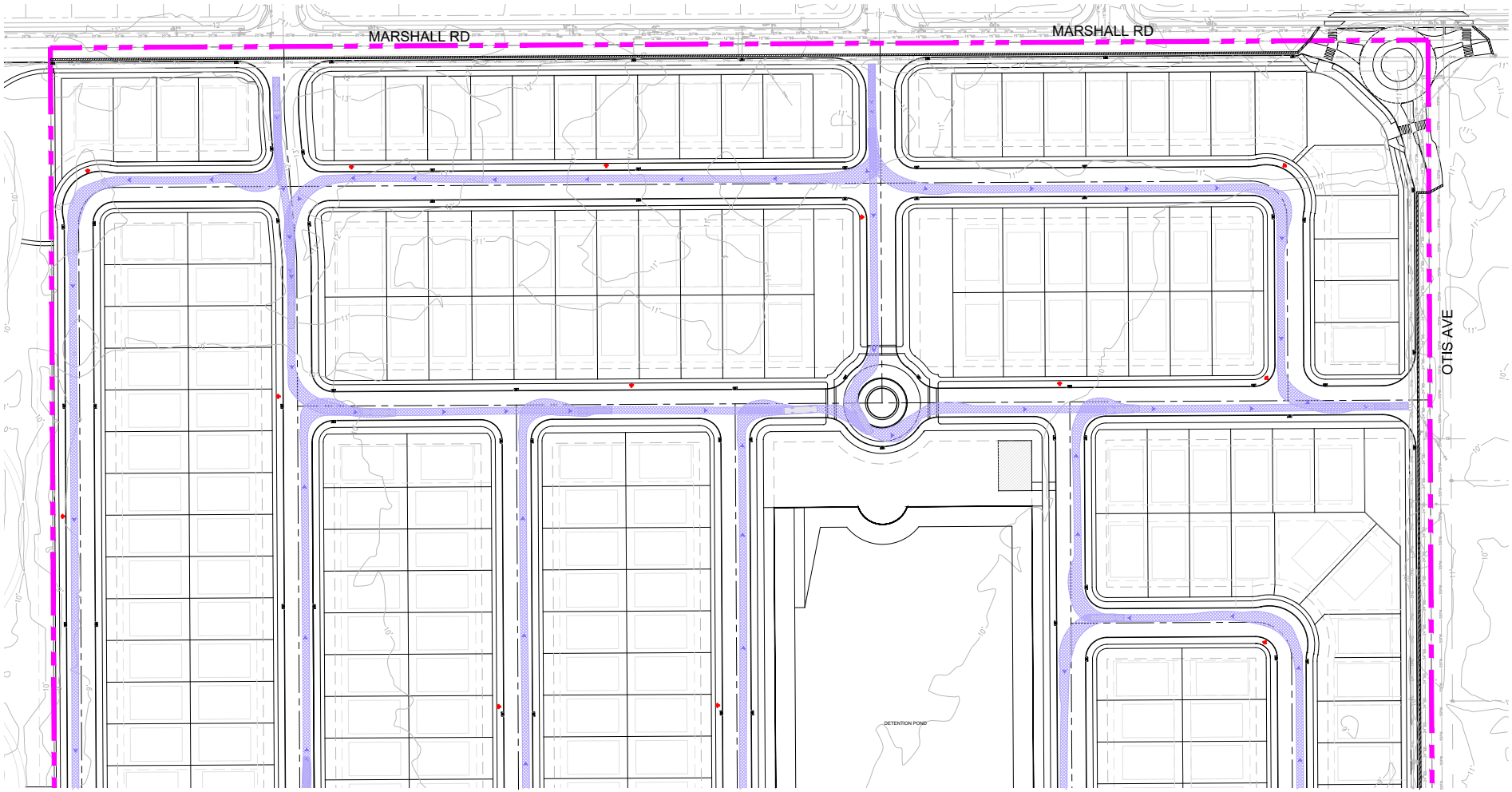
Brar Farms Residential Development Project

Proposed Roadway Circulation Map

SOURCE: City of West Sacramento

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LEGEND

PROPERTY LINE

ROAD CENTERLINE

FIRE TRUCK ACCESS ROUTE

PROPOSED FIRE HYDRANT

PUMPER FIRE TRUCK

OVERALL LENGTH	40.000FT
OVERALL WIDTH	8.167FT
OVERALL BODY HEIGHT	7.745FT
MIN BODY GROUND CLEARANCE	0.656FT
TRACK WIDTH	8.167FT
LOCK-TO-LOCK TIME	5.00S
MAX WHEEL ANGLE	

0 120 240

FEET

SOURCE: Continental Development Consultants, Inc

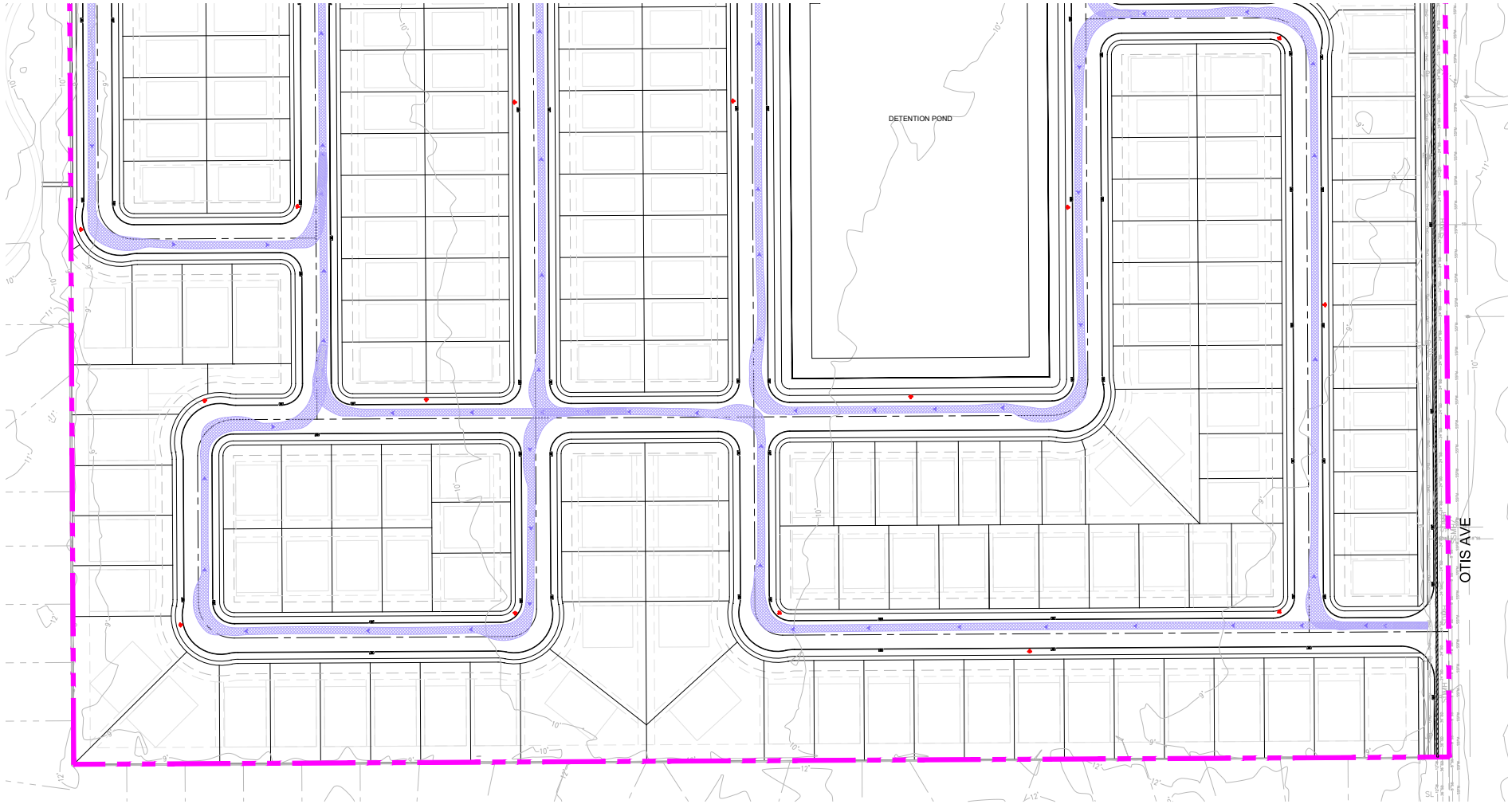
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FIGURE 3-10

Brar Farms Residential Development Project

Proposed Fire Truck Access

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LEGEND

PROPERTY LINE

ROAD CENTERLINE

FIRE TRUCK ACCESS ROUTE

PROPOSED FIRE HYDRANT

PUMPER FIRE TRUCK

OVERALL LENGTH	40.000FT
OVERALL WIDTH	8.167FT
OVERALL BODY HEIGHT	7.745FT
MIN BODY GROUND CLEARANCE	0.656FT
TRACK WIDTH	8.167FT
LOCK-TO-LOCK TIME	5.00S
MAX WHEEL ANGLE	

N

0 120 240

FEET

SOURCE: Continental Development Consultants, Inc

I:\2025\20252264\G\Fire_Truck_Access.ai (5/12/2026)

FIGURE 3-10
Page 2 of 2

Brar Farms Residential Development Project

Proposed Fire Truck Access

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Generally, the proposed streets would have approximately 50 to 60 feet of cross-section right-of-way, and would accommodate 5- to 8-foot-wide sidewalks, landscape strips in-between the curb and sidewalk and Class III bikeways within the proposed development. Improvements adjacent to the project site would include Class II bikeways along Marshall Road and Otis Avenue, and enhanced crosswalks with speed tables and bulb outs. Future homes would include two-car garages and driveways. On-street parking would be available for residents and guests.

3.3.5.1 Lighting

The proposed future development includes the installation of 14-foot pedestrian-scaled streetlights along residential local streets and 28-foot primary streetlights on residential collector streets along Marshall Road and Otis Avenue. All external lighting including residential lighting would use energy-efficient light emitting diode (LED) fixtures. Additionally, lighted bollards would be installed to provide illumination at the pedestrian scale and would be located throughout the parklet and the Central Park. All applicable exterior lighting within the proposed project would be required to comply with City's Municipal Code Section 17.22.080, Lighting and Illumination, including standards related to fixture type, height, shielding, light trespass, and timing controls, as applicable.[11]

3.3.6 Utilities and Infrastructure

The project site is located in a developed area that is currently served by existing utilities, including water, sanitary sewer, storm drain, electricity, gas, and telecommunications infrastructure. Existing and proposed utility connections are discussed below.

3.3.6.1 Water

Water service is provided by the City of West Sacramento. The proposed project would include the installation of 10- and 12-inch water lines throughout the project site that would connect to the existing 12-inch water lines within Marshall Road and Otis Avenue. Additionally, 1-inch residential water service lines and water meters would be installed and connected to the future homes. The City's 2024 Water Master Plan Update, adopted in February 2025, did not contemplate the development of this project. Subsequently, an updated assessment of the project's impacts on the City's existing water infrastructure, the supplemental Water Model Update Memorandum,[12] was completed in October 2025, to identify what improvements would be needed to serve the project. The updated assessment confirmed that the addition of project demand would not cause system pressures to fall below City standards or pipeline velocities to exceed allowable thresholds. The study also found that the proposed on-site systems would integrate with the City's distribution network without creating localized deficiencies and that the proposed project would not require upsizing of off-site mains or trigger premature construction of planned Capital Improvement Project (CIP)-related projects. Other improvements would include water valves, water mains, and fire hydrants within the project site.

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11 City of West Sacramento. 2025i. Zoning Code (Municipal Code Title 17). Chapter 17.22 General Site Regulations. Website: https://ecode360.com/43205860#43205857 (accessed February 2026).

12 Water Works Engineers. 2025. *Water Model Update Memorandum*. October 1.

3.3.6.2 Wastewater

West Sacramento maintains an existing sanitary sewer network within the project vicinity, consisting of 6-inch, 8-inch, 10-inch, 12-inch, 15-inch, and 18-inch sewer lines that convey wastewater from residential areas and other developments toward the Bridgeway Island Pump Station to the north of the project site. The proposed project would include the installation of new sewer manholes, SDR-35 sewer pipes, new sewer laterals, and new sanitary sewer connections to the existing Bridgeway Island Pump Station. The City's 2024 Sewer Master Plan Update, adopted in April 2025, did not contemplate the development of this project; however, an updated assessment of the project's impacts on the City's existing sewer infrastructure was completed in March 2026. According to this updated assessment in the *Sewer Technical Memorandum*, the existing downstream sanitary sewer collection system, including the Bridgeway Island Pump Station, can adequately convey the projected wastewater flows from the proposed project, and no off-site sewer improvements would be required.[13]

3.3.6.3 Stormwater

The project site does not currently contain any detention ponds or stormwater drainage collection system. Under existing conditions, stormwater runoff on the project site either infiltrates at the project site, or sheet flows in both an easterly and westerly direction from a localized high point on the project site. Stormwater runoff flowing east would discharge to the existing storm drain facilities along Otis Avenue and stormwater runoff flowing west would be collected by existing stormwater infrastructure associated with the existing residential development located west and southwest of the project site.

As part of the proposed project, 40 drainage management areas (DMAs) would be installed throughout the project site to collect and convey runoff through the newly installed 15-inch reinforced concrete pipe (RCP) network toward the new 4.02-acre detention basin located at the center of the site. The detention basin would be designed to have a depth of 6.0 feet and a storage capacity of 21.175 acre-feet, temporarily holding stormwater, reducing peak flow impacts on the surrounding infrastructure before ultimately draining into the existing 24-inch public storm drain in Otis Avenue.

To regulate flows, a pump station would be installed within or near the detention pond to control the outflow of stormwater to the existing 24-inch public storm drain in Otis Avenue. Overall, these elements would meet the Low Impact Development (LID) design requirements.

The proposed project would also include storm drainage improvements, which would include the installation of new curbs and gutters, curb inlets and catch basins, and storm drain manholes throughout the project site. Additionally, existing storm drain inlets along Marshall Road and Otis Avenue would be relocated.

Upon completion of the project, the site would be developed with 259 residential lots, roadways, sidewalks, utility infrastructure, and approximately 6.65 acres of open space consisting of the

[13] Dpoudja & Wells Consulting. 2026. *Brar Farms Residential Development Collection System Impact Evaluation.* March.

detention basin, park amenities, parklet, and landscape lots. For purposes of this analysis, the Drainage Study prepared for the proposed project in April 2026, assumed that approximately 55 percent of the proposed development area would be covered by residential units, walkways, roadways, and other paved surfaces. However, the proposed project would incorporate the previously noted LID design requirements, in total providing a runoff capture capacity of 25.6 acre-feet, significantly exceeding the minimum required capacity of 2.1 acre-feet for flow treatment. As previously stated, the recreational and open space areas within the proposed project, including the recreational elements of the detention basin, park, and landscaped lots would be privately owned and maintained by a future HOA. RD 900 would maintain the stormwater and drainage components of the detention basin and said maintenance would be funded by the RD 900 property assessments and to RD 900's standards.

Additionally, as stated above in Section 3.3.6.1, Water, given that the City's 2024 Water Master Plan Update did not contemplate the development of this project, an updated assessment of the project's impacts on the City's existing water infrastructure was completed in October 2025. The updated assessment confirmed that the addition of project demand would not cause system pressures to fall below City standards or pipeline velocities to exceed allowable thresholds. The study also found that the proposed on-site systems would integrate with the City's distribution network without creating localized deficiencies. Further, a Drainage Drain Study was completed for the proposed project on April 25, 2026, to evaluate the potential impacts of the proposed detention basin on the existing downstream stormwater system, which has been reviewed and approved by the City. The study included an assessment of pre- and post-development stormwater flows, including 10-year and 100-year events, for the entire project site as well as for individual DMAs. The study also evaluated the capacity of the proposed detention basin to temporarily store runoff, regulate peak flows, and prevent increases in downstream flows relative to existing conditions. The study concluded that the proposed detention basin, in combination with the on-site storm drain network, would provide adequate storage and conveyance capacity to limit post-development flows to levels consistent with pre-development conditions for 10-year and 100-year storms, with overland flows remaining within acceptable limits.[14] In addition, RD 900 would review the pump station during approval of the proposed project.

3.3.6.4 Electricity and Natural Gas

PG&E would provide electricity to the project site. The proposed project would include connections to the existing PG&E electrical transmission lines that run along the southern and northern edges of the project site. The proposed project would not include the use of natural gas.

3.3.6.5 Telecommunications

Telecommunications service to the project site would be provided by AT&T or Charter Communications.

[14] Continental Development Consultants. 2026. *Drainage Study, Brar Farms 3425 Marshall Road West Sacramento, CA 95691*. April 25, 2026.

3.3.7 Conservation and Sustainability Features

The proposed project would be designed to comply with the water efficiency and energy conservation requirements included in the California Building Standards Code (California Code of Regulations [CCR] Title 24). The proposed residential units would also feature passive use solar heating and cooling, natural ventilation, energy-efficient windows (such as Low E Vinyl, Argon Glass Filled Low E, or Low E Wood Frame), solar roofs, green roofs, or cool roof systems, and energy-efficient home appliances.

3.3.8 Frontage and Off-Site Improvements

The proposed project includes several off-site improvements. These off-site improvements would include frontage improvements along the north side of the project site on Marshall Road, consisting of new sidewalk, curb, and gutter infrastructure, as well as undergrounding of all overhead utilities, construction of street lighting, and installation of landscaping. Similar frontage improvements would also be constructed on the south side of Marshall Road and western side of Otis Avenue. A single-lane roundabout at the intersection of Marshall Road and Otis Avenue adjacent to the northeastern corner of the project site would also be developed. The primary purpose of this facility is to control existing and project-related traffic along Marshall Road and Otis Avenue.

3.3.9 Construction

Grading for the proposed curb and gutters would occur on slopes with less than 2 percent grade. The detention basin would involve steeper grading, with side slopes of up to 4:1 (four feet horizontal and one foot vertical) along the perimeter of the detention basin and interior slopes of up to approximately 5 percent to facilitate drainage.

Project site preparation would involve grading activities and placement of fill to raise site elevations along the southerly property line and to achieve proposed finished floor elevations of the site. Ground disturbance would not exceed a depth of excavation of 11 feet below ground surface. It is assumed that the entirety of the approximately 60-acre project site would be disturbed during grading and construction activities. It is anticipated that during project construction a total of 31,422 cubic yards would be cut through grading and excavation activities, and 88,068 cubic yards of fill would be required. Additionally, it is assumed that a portion of the required fill would come from on-site excavation, with the remaining fill imported to achieve the proposed site elevations. All fill would remain on site, and no soil would be exported or hauled off. For purposes of this EIR, analysis assumes that construction of the proposed project is anticipated to begin in 2027 or 2028 and would commence within 12 or 18 months of project approval. This assumption provides a more conservative basis for evaluating potential environmental impacts; however, construction may require a longer timeframe.

3.4 PROJECT APPROVALS

Table 3.A: Permits and Approvals, identifies the permits and approvals the proposed project would need to obtain for implementation. In addition, as part of the proposed project, a DA between the City of West Sacramento and the Project Applicant would be included. The DA would vest the developer's rights to build the project within a specified term in exchange for negotiated obligations including construction, funding, and maintenance of required public infrastructure, including the proposed off-site improvements and roundabout.

Table 3.A: Permits and Approvals

Lead Agency	Permits/Approvals
City of West Sacramento	● Environmental Review ● Certification of the Environmental Impact Report ● General Plan Amendment ● Southport Framework Plan Overlay Amendment ● Zoning Map/Code Amendment to rezone the project site ● Tentative Subdivision Map ● Design Review Approval of Brar Farms Design Guidelines ● Development Agreement between the City of West Sacramento and the Project Applicant
Other Agencies	
United States Fish and Wildlife Service/ California Department of Fish and Wildlife	● Coverage under the Yolo Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP)

Source: Compiled by LSA (2026).

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4.0 EXISTING SETTING, ENVIRONMENTAL ANALYSIS, IMPACTS, AND MITIGATION MEASURES

OVERVIEW OF ENVIRONMENTAL SETTING

State CEQA Guidelines Section 15125 requires an Environmental Impact Report (EIR) to include a short description of the physical environmental conditions in the vicinity of a project. Accordingly, this section of the Draft EIR provides a description of existing conditions on the project site and surrounding vicinity. More detailed descriptions of existing conditions relevant to each environmental resource are provided in the subsequent sections. An EIR must also include a discussion of cumulative impacts. This chapter identifies a list of past, present, and reasonably foreseeable probable future projects that when considered with the proposed project could result in cumulative impacts. More detailed discussions of cumulative impacts relevant to each environmental resource are provided in the subsequent sections.

Regional Setting

As discussed in Chapter 3.0, Project Description, the approximately 60-acre project site is at the corner of Marshall Road and Otis Avenue, within the western portion of West Sacramento in Yolo County. The project site consists of five parcels (Assessor's Parcel Numbers [APNs]: 045-260-008, 009, 010, 045-270-001, and -002).

Project Site Setting

The project site is undeveloped and relatively flat with a gentle slope toward the southwest. According to an aerial drone survey conducted on October 25, 2025, site elevations along the project site range from approximately 9 to 13 feet above mean sea level. However, the project site sits roughly 3 feet lower than the adjacent residential neighborhood to the south, where an existing retaining wall separates the higher grade from the project site. Although the project site primarily consists of loose disced soil from previous tilling activities, small patches of vegetation are present mainly along the northern edge of the site that consist of volunteer weeds and annual grasses.

The project site was the location of H&H Nishimura Farms until 2016 and was historically used for agricultural purposes. Eight buildings associated with H&H Nishimura Farms previously stood on the project site but have since been demolished. The project site is currently undeveloped, fully graded, and unoccupied. However, the project site is seasonally farmed for hay by a volunteer farmer and maintained by the property owner, who mows and tills the land as needed.[1]

Pacific Gas & Electric Company (PG&E) transmission lines run along the northern and eastern sides of the project site boundaries. Additionally, an existing drainage ditch runs along approximately 1,000 feet of the western edge of the project site next to the Bridgeway Lakes retention pond.

[1] Project Applicant. 2025. Bi-weekly Meeting. Personal communication with LSA. March 26.

CHAPTER FORMAT

This chapter contains 20 sections, and each section addresses an environmental topic identified in Appendix G to the *State CEQA Guidelines*. For each environmental topic analyzed, the EIR includes a detailed explanation of the existing conditions, thresholds of significance that will be applied to determine whether the project's impacts are significant or less than significant, analysis of the environmental impacts, and a determination of whether the project would have a significant impact if implemented. A "significant impact" or "significant effect" means "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance." (*State CEQA Guidelines* Section 15382). As required by *State CEQA Guidelines* Section 15130, each environmental topic section in this chapter includes a discussion of the cumulative effects of the project when considered in combination with other projects.

Each of the sections is organized into ten subsections:

- **Introduction** briefly describes the topics and issues covered in the section.
- **Scoping Process** briefly summarizes any relevant comments that were received during the scoping process.
- **Methodology** describes the approach and methods employed to complete the environmental analysis for the issue under investigation.
- **Existing Environmental Setting** describes the relevant physical conditions that exist at the time of the issuance of the Notice of Preparation (NOP) that may influence or affect the issue under investigation. This section focuses on physical site characteristics that are relevant to the environmental topic being analyzed.
- **Regulatory Setting** lists and discusses the laws, ordinances, regulations, plans, and policies that relate to the specific environmental topic and how they apply to the proposed project.
- **Thresholds of Significance** sets forth the thresholds that are the basis of the conclusions regarding significance, which are primarily the criteria in Appendix G to the *State CEQA Guidelines*, General Plan, or Zoning Code.
- **Project Impacts** describes the potential environmental changes to the existing physical conditions that may occur if the proposed project is implemented. Evidence is presented to show the cause-and-effect relationship between the proposed project and potential changes in the environment. In accordance with *State CEQA Guidelines* Section 15126.2(a), this EIR is required to "identify and focus on the significant environmental effects" of the proposed project. The magnitude, duration, extent, frequency, and range or other parameters of a potential impact are ascertained to the extent feasible to determine whether impacts may be significant. In accordance with CEQA, potential project impacts, if any, are classified as follows for each of the environmental topics discussed in this EIR.

- **Significant and Unavoidable Impact:** If the proposed project is approved with significant and unavoidable impacts, the decision-making body is required to adopt a statement of overriding considerations pursuant to *State CEQA Guidelines* Section 15093 explaining why the benefits of the proposed project outweigh the unavoidable adverse environmental effects caused by those significant and unavoidable environmental impacts.

- **Less than Significant Impact with Mitigation Incorporated:** This classification refers to potentially significant environmental impacts that can be feasibly mitigated to a level of insignificance. If the proposed project is approved, the decision-making body is required to make findings pursuant to *State CEQA Guidelines* Section 15091 that significant impacts have been mitigated to the extent feasible through implementation of mitigation measures.

- **Less than Significant Impact:** Less than significant impacts are environmental impacts that have been identified but are not potentially significant. No mitigation is required for less than significant impacts.

- **No Impact:** A "no impact" determination is made when the proposed project is found to have no environmental impact.

- **Level of Significance Prior to Mitigation** summarizes the potentially significant impacts of the proposed project, if any, prior to mitigation.

- **Mitigation Measures** are project-specific measures that avoid, minimize, rectify, reduce, eliminate, or compensate for a potentially significant impact.

  - **Regulatory Compliance Measures** may also be identified in this section. Regulatory Compliance Measures describe any relevant and applicable laws or regulations that must be adhered to with respect to the construction or operation of the proposed project and would reduce or lessen potential impacts related to a particular issue area.

- **Level of Significance after Mitigation** describes the significance of potential impacts after implementation of mitigation measures. Potential significant unavoidable impacts are clearly stated in this section.

- **Cumulative Impacts** refers to potential environmental changes to the existing physical conditions that may occur as a result of the proposed project implementation together with all other reasonably foreseeable, planned, and approved future projects in the vicinity of the project site that produce related impacts. *State CEQA Guidelines* Section 15355(b) defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Cumulative impacts may result from individually minor but collectively significant projects taking place over a period of time. Projects that have progressed to the stage where CEQA review has been initiated are normally treated as foreseeable probable future projects. For each of the environmental topics considered in this EIR, the geographic scope of the cumulative analysis is defined.

THRESHOLDS OF SIGNIFICANCE

The threshold questions used in this EIR are consistent with Appendix G of the *State CEQA Guidelines* (2025).

EFFECTS ADDRESSED IN THIS DRAFT EIR

Sections 4.1 through 4.20 of this chapter describe the environmental setting of the project as evaluated in this Draft EIR and the impacts that are expected to result from implementation of the proposed project. Mitigation measures are proposed to reduce potential impacts, where appropriate.

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

CUMULATIVE PROJECTS

Section 15130(a) of the *State CEQA Guidelines* requires a discussion of the cumulative impacts of a project when the project's incremental effect is cumulatively considerable. Cumulatively considerable, as defined in *State CEQA Guidelines* Section 15065(a)(3), means that the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." *State CEQA Guidelines* Section 15355(b) defines a cumulative impact as two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. *State CEQA Guidelines* Section 15130(b) states either of the following elements are necessary for an adequate discussion of significant cumulative impacts:

- A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or

- A summary of projections contained in the adopted General Plan or related planning document, or in a prior environmental document that has been adopted or certified, and that described or evaluated regional or areawide conditions contributing to the cumulative impact.

Consistent with *State CEQA Guidelines* Section 15130(b), this EIR evaluates cumulative impacts through the incorporation of a list of past, present, and reasonably foreseeable future projects (referred to herein as cumulative projects), which is presented in **Table 4.A: Summary of Cumulative Projects**. As shown in **Table 4.A**, the projects include various land uses, such as residential and mixed-uses. As stated above, the analysis of cumulative impacts associated with these projects in combination with the proposed project is provided in the cumulative impacts discussion under each individual impact category in Chapter 4.0.

The locations of the cumulative projects are shown on **Figure 4.1: Cumulative Projects**. Although some projects on the list have been completed since issuance of the NOP, they remain on the list because they are part of the cumulative analysis for the EIR.

It is noted that some of the cumulative projects may not be completed in 2028 (the proposed project's anticipated buildout year), may never be built, or may be approved and built at reduced densities. However, to provide a conservative forecast, the future baseline forecast assumes that all of the cumulative projects will be fully built out by 2028.

The discussion of cumulative impacts "should be guided by the standards of practicality and reasonableness" (*Environmental Protection Info. Center v. Department of Forestry & Fire Protection* (2008) 44 Cal.4th 459, 524). A proposal that has not crystallized to the point that it would be reasonable and practical to evaluate its cumulative impacts need not be treated as a probable future project (*City of Maywood v. Los Angeles Unified School District* (2012) 208 Cal.App.4th 362, 397).

Rather, a potential future project qualifies for inclusion in an analysis of cumulative impacts only to the extent the future project is "both probable and sufficiently certain to allow for meaningful cumulative impact analysis" (Id. at 398; see *City of Long Beach v. Los Angeles Unified School Dist.* (2009) 176 Cal.App.4th 889, 902 [when "review[ing] the agency's decision to include information in the cumulative impacts analysis[,] ... [w]e determine whether inclusion was reasonable and practical"]).

Table 4.A: Summary of Cumulative Projects

Cumulative Project No.	Project	Description	Location	Project Status	Distance From the Proposed Project
City of West Sacramento					
1	**The Crest**	Residential subdivision, Vesting Tentative Tract Map 5248, consisting of 59 single family detached units on approximately 7 gross acres. The project density is 11.8 units per acre. The project proposes a minimum lot size of 1,944-square feet and maximum of 2,958 square feet, with a typical lot size of 2,160 square feet.	Northwest corner of the intersection of Fountain Drive and Lighthouse Drive	Project under design review as of 2024.	5.20 miles northeast of the project site.
2	**Five20 5th Street**	Proposed mixed use project consisting of 125 multifamily units, a cafe, and multi-use flex space at 520 Fifth Street.	520 Fifth Street	Project under design review as of 2024.	4.70 miles northeast of the project site.
3	**641 5th Street Affordable Housing Project**	The City of West Sacramento facilitated private acquisition of a vacant 0.51-acre parcel at 641 5th Street for a future 36-unit affordable housing project.	641 5th Street	Completed. (Notice of Exemption filed 2/19/25).	4.6 miles northeast of the project site.
4	**3895 Marshall Road Vesting Tentative Subdivision Map**	This project is a 9-lot single family subdivision. The average size of each residential lot will be 0.76 acres with a minimum lot size of 0.637 acres and a maximum lot size of 1.261 acres. The lot density is approximately 1.22 dwelling unit per acre.	3895 Marshall Road	Final map under City review. Approved by Planning Commission 4/20/23.	0.35 mile west of the project site.
5	**1990 Lake Washington Boulevard Affordable Housing Project**	Construction of a new 152-unit all affordable rental duplex complex. The project required a conditional use permit for an all-residential product in a MU-NC (Mixed-Use Neighborhood Commercial) zone and design review.	1990 Lake Washington Boulevard	Under construction as of 2022	2.15 miles northeast of the project site.
6	**326 5th Street**	Construction of a 30-unit apartment building at 326 5th Street. The unit mix would contain 1 and 2-bedroom apartments ranging in size from 510 to 1,100 square feet.	326 5th Street	Under City review as of January 2023.	4.70 miles northeast of the project site.
7	**Lewis Homes**	Construction of a 210-unit (105 individual buildings) duplex gated 2-story multi-family rental community.	3130 and 3350 Promenade Street	Under construction as of 2025.	0.50 mile north of the project site.
8	**River One Phase Two**	The project is a five story, 95-unit multifamily project. The project is the second phase of the River One project site and is designed to complement the design of River One.	721 3rd Street	Approved as of 2023.	4.50 miles northeast of the project site.
9	**Four 40 West**	Development of 106 single-family dwelling units, an approximately 0.43-acre public neighborhood park, a private dog park, private garden and common area, and related infrastructure improvements.	Northwest corner of 5th Street and E Street	Under construction as of 2023.	4.60 miles northeast of the project site.

Table 4.A: Summary of Cumulative Projects

Cumulative Project No.	Project	Description	Location	Project Status	Distance From the Proposed Project
10	**50 Waterfront Place**	Development of a 165-unit 8-story residential building with underbuilding parking. The units are comprised of studio one- and two-bedroom units and includes a business services area, fitness area, dog wash bike storage and balconies.	50 Waterfront Place	Under construction as of 2022.	4.60 miles northeast of the project site.
11	**Bridge District Phase VI**	Construction of a 7-story market rate apartment building and mixed-use amenity building. The project would include 21 ground-floor townhome units which would front on Riverfront Street and Mill Street and 239 apartment units located above podium parking.	Northeast corner of Riverfront Street and Mill Street	Under construction as of 2023.	4.00 miles northeast of the project site.
12	**Grand Street Apartments**	Construction of a 195 unit, five story market rate multifamily residential project at 840-850 Delta Lane. The project will include on-site amenities consisting of a pool, rooftop deck and an at grade parking garage in the rear of the property.	840 and 850 Delta Lane	Under design review as of September 2022.	4.20 miles northeast of the project site.
13	**851 Sacramento Avenue**	Development of approximately 445 residential unit five story building with ground floor live/work units along much of the frontage as well as a one-story retail building at the western side of the property. The live/work units are 45 feet deep on the ground floor with direct access to the sidewalk on Sacramento Avenue	851 Sacramento Avenue	Under City review as of December 2021.	4.50 miles northeast of the project site.
14	**Linden Point Live/Work Design Review**	Construction of two buildings with commercial space on the ground floor and residential units on the second and third floors. Building A has 4 live/work units (residential above commercial), and Building B has 2 live/work units (residential above commercial) and 4 stacked residential flats over commercial.	3101 Allan Avenue	Design review approval on 7/17/2020, and the Planning Commission denied an appeal on 11/5/2020. The project recently received a time extension.	0.95 mile northeast of the project site.
15	**River One**	Construction of a 7-story, 193 room hotel and a 7-story, 57 room condominium building. The project also includes an underground parking garage.	Northeast corner of 3rd Street and Tower Bridge Gateway	Planning Commission approved tentative subdivision map 11/21/2019. City Council approved the project design 12/11/2019.	4.50 miles northeast of the project site.

Table 4.A: Summary of Cumulative Projects

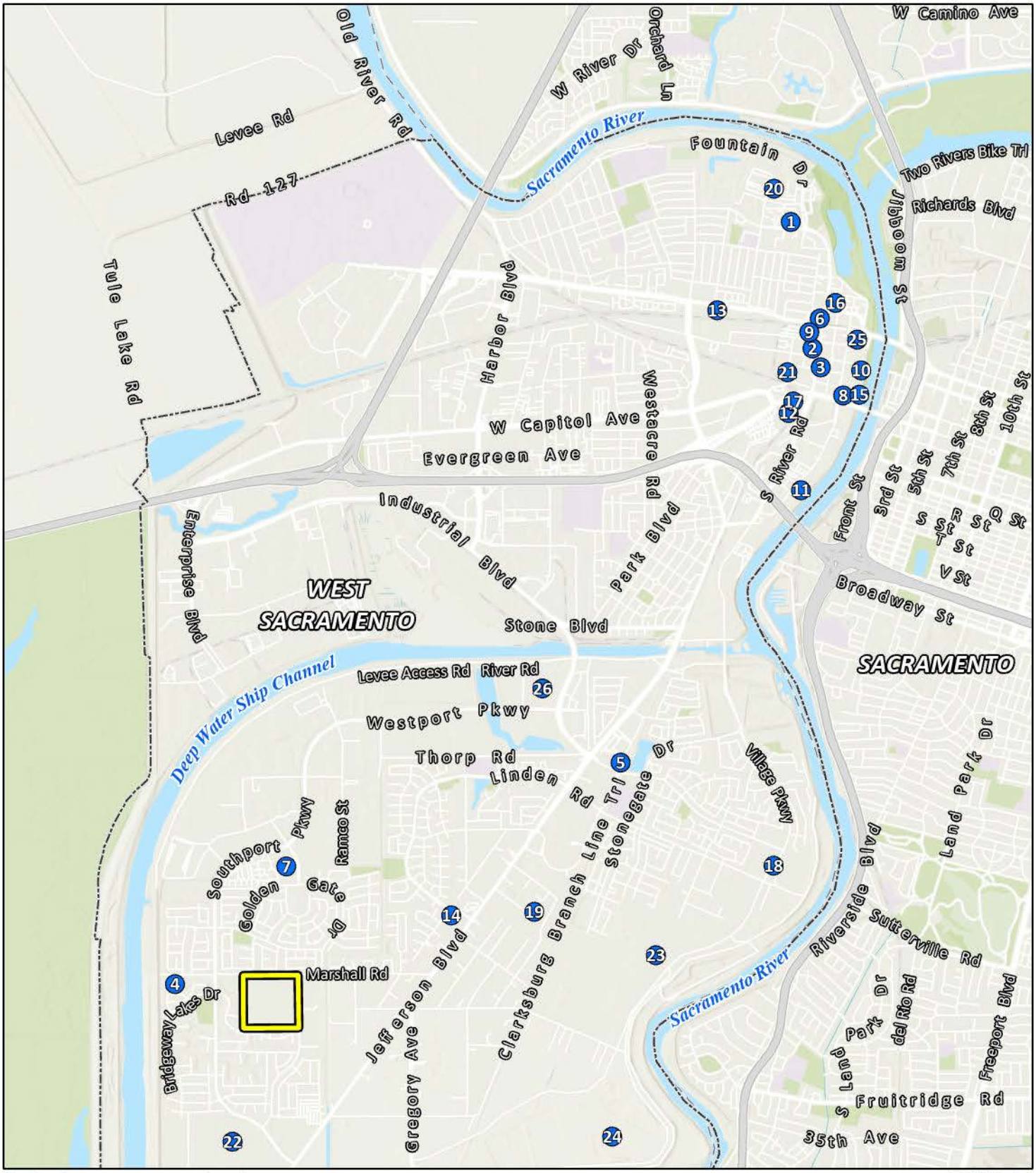
Cumulative Project No.	Project	Description	Location	Project Status	Distance From the Proposed Project
16	**218 4th Street Townhomes**	Construction of a 25-unit condominium row-house style project. The project requires approval from the Planning Commission for a Vesting Tentative Subdivision Map, design review and minor deviations from the Washington Specific Plan.	218 4th Street and 407 B Street	Planning Commission approved project 5/21/2020.	4.85 miles northeast of the project site.
17	**West Gateway Place Phase II**	Construction of a 60-unit affordable housing project. The project would be comprised of two buildings combined by a central courtyard and walkway. Parking will be provided on-site and in the public parking lot at 808 Tower Bridge Gateway.	801-810 Delta Lane	Project under construction as of 2025.	4.25 miles northeast of the project site.
18	**River Oaks Vesting Tentative Subdivision Map**	Development of 115 single family homes on 19.3 acres. The proposed project consists of two villages bisected by Village Parkway.	Both sides of Village Parkway between Linden Road and Lake Washington Boulevard.	Project under design review as of 2018.	2.60 miles northeast of the project site.
19	**Meyer Ranch Subdivision**	The project site includes sixteen individual lots that were created as part of an old subdivision map that was recorded in 1913. The project will reconfigure the lots to create sixteen new lots, each 0.98 acre in size, for the development of ranchette single family homes.	East of Jefferson Boulevard and south of Perkins Road.	Project is currently under construction.	1.25 miles northeast of the project site.
20	**The Rivers Phase 2 Vesting Tentative Subdivision Map 4732**	Development of approximately 626 single-family homes, an approximately 12.3-acre K-8 school, a two-acre park, and supporting infrastructure on approximately 68 acres of the approved Lighthouse Marina and Riverbend Development Project area in the City of West Sacramento. If the Washington Unified School District (WUSD) does not construct and operate the school, then the project would construct an additional 176 residential units on the 12.3-acre site for a total of 802 units.	At the corner of Fountain Drive and Lighthouse Drive and between Woodhaven Pl and Fountain Drive.	Under construction as of 2022.	5.10 miles northeast of the project site.

Table 4.A: Summary of Cumulative Projects

Cumulative Project No.	Project	Description	Location	Project Status	Distance From the Proposed Project
21	**Raley's Landing**	The proposed project would contain approximately 900 multifamily residential units, 845,000 gross square feet of office space, 102,000 square feet of commercial/retail uses, and possibly 100–300 hotel rooms with a 7,000- to 15,000-square-foot conference center; it would provide between 4,351 and 4,651 on-site parking spaces, including surface and multilevel parking spaces.	Bounded by A Street on the north, Sixth and Eighth Streets on the west, the Sacramento River on the east, and State Route (SR) 275 on the south.	Approved as of 2006. The project area has been largely built out with the Washington Commons, the Ziggurat, and CalSTRS as of December 2025. River One (Cumulative Project No. 15) and 50 Waterfront Place (Cumulative Project No. 10) are the remaining projects in the project area.	4.80 miles northeast of the project site
22	**Yarbrough Master Plan**	The proposed project consists of approximately 713 acres and is located in the southwest village of Southport and generally bound by the Deep-Water Ship Channel to the west, the Bridgeway Lakes communities to the north, agricultural land immediately to the east. The project will support a balanced mix of land uses including approximately 3,004 dwelling units, 150,000 square feet of commercial space, an 18-hole public golf course, and a 55.9-acre interconnected lake park and canal system.	Bounded by the DWSC to the west, the Bridgeway Lakes communities to the north, agricultural land immediately to the east.	Amended DA approved. In 2024, the Yarbrough Project received approval of the Phase I Vesting Tentative Subdivision Map (VTSM) and Development Agreement (DA) amendments. The Phase I development area is bounded on the north by Bevan Road, non-project agricultural lands to the east and southeast, Burrows Avenue to the south, and undeveloped agricultural land (part of which will be future Yarbrough phases) and the Main Drain to the west. The Phase I VTSM proposes 548 "small lots" - defined as those that will be built as detached single-family residential	0.80 mile south of the project site.

Table 4.A: Summary of Cumulative Projects

Cumulative Project No.	Project	Description	Location	Project Status	Distance From the Proposed Project
				units – and additional 70.4 acres of "large lot" parcels for a total of approximately 179 acres of the larger 713-acre Yarbrough project area.	
23	**Liberty Specific Plan**	The proposed project encompasses 340 acres and consists of up to 1,503 residential units, approximately 10,000 square feet of retail/commercial space, and a network of parks, greenbelts, and trails in the Northeast Village of the Southport Framework Plan area.	Bounded by the Sacramento River levee system to the east, Davis Road to the south, the Clarksburg Branch Line Trail to the west, and Linden Road to the north.	Approved as of April 2025.	1.75 miles east of the project site.
24	**River Park Master Plan**	The proposed modified project is a reconfigured residential mixed-use community that would provide approximately 2,700 residential units, neighborhood commercial, and a network of trails, parkways, parks, and open space.	Bounded on the east and south by the Sacramento River levee system, on the north by Davis Road, and on the west by the Clarksburg Branch Line Pedestrian and Bike Trail.	Original project approved in 2008. Modified project awaiting Planning Commission and City Council approval.	1.45 miles southeast of the project site.
25	**210 E Street Apartments**	The proposed project consists of 30 residential units, a mix of studios and one-bedroom apartments, arranged within a three-story structure.	Northwest corner of E Street and 2nd Street.	Approved as of October 2025.	4.90 miles northeast of the project site.
26	**Sepion Technologies Advanced Manufacturing Project**	The proposed project would include 1 million square feet of office and manufacturing space on 60 acres at the northwest corner of Lake Washington Boulevard and Southport Parkway.	Northwest corner of Lake Washington Boulevard and Southport Parkway.	Approved as of May 2025.	2.08 miles northwest of the project site.



LSA

Project Site

City of West Sacramento Boundary

Cumulative Projects

FIGURE 4-1

0 2000 4000

FEET

SOURCE: Esri (2025)

Brar Farms Residential Development Project

Cumulative Projects

I:\2025\20252264\GIS\Pro\Farms Residential Development Project\Farms Residential Development Project.aprx (1/8/2026)

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4.1 AESTHETICS

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for the proposed Brar Farms Residential Development Project (proposed project) to impact visual and aesthetic resources in the City of West Sacramento (City). This section is based, in part, on the City's neighborhood Design Guidelines[1] prepared for the proposed project, information provided in the City's General Plan, the Southport Framework Plan, the Southport Design Guidelines, and applicable provisions of the City's Municipal Code.

4.1.1 Scoping Process

Some comments received during the scoping period addressed aesthetics. These comments raised concerns about the project's incompatibility with surrounding land uses and community character, alterations to the existing visual landscape, and the potential for increased nighttime lighting associated with the proposed project.

4.1.2 Methodology

Potential impacts to aesthetics associated with the proposed project are based on the nature and degree of visible change brought about by the proposed project along with how viewers are likely to respond to those changes and is based on several factors, including the scale of the development; the mass of the development; the context of the development (i.e., its consistency with and proportion to surrounding land uses); changes in vistas and viewsheds; potential conflicts with applicable zoning and other regulations governing scenic quality; changes to scenic resources along designated scenic roads, and the introduction of new sources of light and glare.

The concepts and terminology used in this analysis are described below.

- **Scenic Resources:** Scenic resources are defined as natural or man-made elements that contribute to an area's scenic value and are visually pleasing. Scenic resources include landforms, vegetation, water, or adjacent scenery and may include a cultural modification to the natural environment.

- **Scenic Vista:** A scenic vista is a viewpoint that provides expansive views of a highly valued landscape for the public's benefit. It is usually viewed from some distance away. Aesthetic components of a scenic vista include (1) scenic quality, (2) sensitivity level, and (3) view access. A scenic vista can be impacted in two ways: a development project can have visual impacts by either directly diminishing the scenic quality of the vista or by blocking the view corridors or "vista" of the scenic resource. Important factors in determining whether a proposed project would block scenic vistas include the project's proposed height, mass, and location relative to surrounding land uses and travel corridors.

- **Scenic Corridors:** Scenic corridors are channels that facilitate movement (primarily by automobile, transit, bicycle, or foot) from one location to another with expansive views of natural landscapes and/or visually attractive man-made development. Scenic corridors analyzed

[1] City of West Sacramento. n.d. *Brar Farms. Neighborhood Design Standards.*

under CEQA typically include State-designated Scenic Highways and locally designated scenic routes.

- **Scenic Quality:** The scenic quality of a streetscape, building, group of buildings, or other man-made or natural feature creates an overall impression of an area. For example, a scenic vista along the boundary of a community, a pleasing streetscape with trees, and well-kept residences and yards are scenic resources that create a pleasing impression of an area. In general, concepts of scenic quality can be organized around four basic elements: (1) site utilization, (2) buildings and structures, (3) landscaping, and (4) signage. Adverse scenic quality effects can include the loss of aesthetic features or the introduction of contrasting features that could contribute to a decline in overall scenic quality.

- **Glare:** Glare is identified as a continuous or periodic intense light that may cause eye discomfort or be temporarily blinding to humans. Glare in the form of sunlight reflecting off windows and building surfaces may affect adjacent uses or interfere with the operation of motor vehicles, aviation, or other activities. Glare can also be produced during evening and nighttime hours by artificial light sources, such as illuminated signage and vehicle headlights. Glare-sensitive uses generally include residences and transportation corridors (i.e., roadways).

- **Light Source:** A device that produces illumination, including incandescent bulbs, fluorescent and neon tubes, halogen and other vapor lamps, and reflecting surfaces or refractors incorporated into a lighting fixture, are considered to be light sources. Any translucent enclosure of a light source is considered to be part of the light source.

4.1.3 Existing Environmental Setting

4.1.3.1 Local Context

According to the United States Census Bureau, West Sacramento is located within the Sacramento, CA Urbanized Area,[2] which also includes the cities of Sacramento, Elk Grove, Roseville, Citrus Heights, Folsom, Rancho Cordova, Rocklin, and Woodland. As described in the *State CEQA Guidelines* Section 15387 and defined by the United States Census Bureau, an "urbanized area" is a central city or a group of contiguous cities with a population of 50,000 or more people, together with adjacent densely populated areas having a population density of at least 1,000 people per square mile.[3] Although the project site is located in a semi-rural area characterized by agricultural uses with agricultural lands that directly border the project site to the east, the project site is also directly adjacent urbanized areas to the north as south. Accordingly, the City of West Sacramento as a whole is characterized as an urbanized area. For the purposes of this analysis and for consistency with CEQA, this analysis evaluates the project using applicable urbanized area standards.

[2] United States Census Bureau. 2023. *Sacramento, CA Urbanized Area No. 77068.* Website: https://census reporter.org/profiles/40000US77068-sacramento-ca-urban-area/ (accessed February 2026).

[3] United States Census Bureau. 2022. *2020 Census Urban Areas FAQs.* December. Website: https://www2.census.gov/geo/pdfs/reference/ua/Census_UA_2020FAQs.pdf (accessed February 2026).

4.1.3.2 Visual Character of the Project Site

The approximately 60-acre project site is located at the corner of Marshall Road and Otis Avenue, within the western portion of West Sacramento in Yolo County.

The project site is undeveloped and relatively flat with a gentle slope toward the southwest. Site elevations along the property range from approximately 8 to 10 feet above mean sea level. Although the project site primarily consists of loose disced soil from previous tilling activities, small patches of vegetation are present mainly along the northern edge of the site that consist of volunteer weeds and annual grasses. The project site is currently undeveloped, fully graded, and unoccupied. However, the project site is seasonally farmed for hay by a volunteer farmer and maintained by the property owner, who mows and tills the land as needed.

PG&E transmission lines run along the northern and eastern sides of the project site boundaries. Additionally, an existing drainage ditch runs along approximately 1,000 feet of the western edge of the project site next to the Bridgeway retention pond.

4.1.3.3 Visual Character of the Surrounding Area

While West Sacramento contains numerous areas and viewsheds with relatively high scenic value, there are no officially designated scenic vista points in West Sacramento. Visual resources in West Sacramento include the Sacramento skyline and the Vaca Mountains.

The project site is bounded to the north by Marshall Road, to the east by Otis Road and a mix of residential and agricultural uses, to the south by single-family residential uses, and to the west by an existing retention pond that is part of the Bridgeway Lakes Community Park, and the Bridgeway Lakes residential development.

According to the California Scenic Highway Mapping System, there are no California Department of Transportation (Caltrans) designated scenic highways near the project site.[4]

4.1.4 Regulatory Setting

This section includes applicable federal, State, regional, and City policies and regulations.

4.1.4.1 Federal Regulations

There are no federal regulations that apply to the proposed project with respect to aesthetics.

4.1.4.2 State Regulations

Caltrans Scenic Highway Program. The California Department of Transportation (Caltrans) Scenic Highway Program protects the natural scenic beauty of the State's highways and corridors by designating Scenic Highways throughout the State. Caltrans defines a Scenic Highway as any freeway, highway, road, or other public right-of-way that traverses an area of exceptional scenic quality. Other

[4] California Department of Transportation (Caltrans). n.d. *California Scenic Highway Mapping System*. Website: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa (accessed February 2026).

considerations given to a Scenic Highway designation include how much of the natural landscape a traveler may see and the extent to which visual intrusions degrade the scenic corridor.

4.1.4.3 Regional Regulations

There are no regional regulations that apply to the proposed project with respect to aesthetics.

4.1.4.4 Local Regulations

City of West Sacramento General Plan 2035. The City of West Sacramento General Plan is intended to guide future growth and development within the City and is comprised of several elements. Goals and policies related to aesthetics are intended to enhance the City's image and identity and create a sense of community. The Land Use Element of the City's General Plan contains goals and policies related to aesthetics.

The following goals and policies applicable to the proposed project and related to aesthetics and scenic quality are presented in the Land Use, Urban Structure and Design, and Natural and Cultural Resources Elements:

Sustainable Growth and Development

- **Goal LU-1:** To provide for sustainable, orderly, well-planned, and balanced growth that meets the needs of residents and businesses, uses land efficiently, and is supported by adequate infrastructure.
    - **Policy LU-1.1:** The City shall encourage compact development patterns and higher development intensities that use land efficiently; preserve open space; support transit, bicycle, and pedestrian mobility; increase housing diversity; and provide for strong neighborhood commercial retail viability.
    - **Policy LU-1.4:** In existing developed areas designated for new uses, the City shall ensure the orderly transition to new uses consistent with the adopted General Plan and phase out existing uses during the transition period.
- **Goal LU-3:** To promote the development of complete residential neighborhoods that include a range of residential densities and a variety of housing types, and address the housing needs of various age and socio-economic groups who reside in West Sacramento.
    - **Policy LU-3.4:** The City shall promote the preservation of the integrity of existing stable residential neighborhoods and shall respect existing neighborhood scale and character when infilling and/or upgrading existing residential.
    - **Policy LU-3.6:** The City shall preserve, protect, and enhance established neighborhoods by providing sensitive transitions between these neighborhoods and adjoining areas, and requiring new development, both private and public, to respect and respond to existing design, buildings, streetscapes, and open spaces that contribute to the overall character of the neighborhood.

- **Policy LU-3.7:** The City shall promote the creation of well-defined residential neighborhoods in newly-developing areas. Each of these neighborhoods should have a clear focal point, such as a neighborhood shopping center, park, school, or other open space and community facility, and should be designed to promote pedestrian convenience. To this end, the City shall encourage the use of existing West Sacramento neighborhoods, including the modified grid street system, as models for the planning and design of new residential neighborhoods.

- **Policy LU-3.8:** The City shall require the design and development of neighborhoods that are pedestrian-encouraging and include features such as short blocks, broad and well-appointed sidewalks (e.g., lighting, landscaping, adequate width), tree-shaded streets, buildings that define and are oriented to adjacent streets and public spaces, limited driveway curb cuts, paseos and pedestrian lanes, alleys, traffic calming features, convenient pedestrian street crossings, and access to transit.

- **Goal LU-8:** To protect open space for its recreational, agricultural, safety, and environmental value and provide adequate parks and open space areas throughout the city.

  - **Policy LU-8.1:** The City shall ensure that sufficient parks, open space, water corridor parkways, and trails are planned throughout the city, to ensure adequate facilities are available to existing and future residents.

Citywide Urban Structure and Design

- **Goal UD-1**: To promote development and urban design that creates neighborhoods, districts, centers, and corridors that are unique and contribute positively to the overall urban structure and character of West Sacramento.

  - **Policy UD-1.4:** The City shall endeavor to maintain and enhance the distinctiveness and integrity of the various neighborhoods, districts, centers, and corridors within the city.

  - **Policy UD-1.7:** The City shall promote the design of complete and well-structured neighborhoods that respect and respond to the physical characteristics, buildings, streetscapes, open spaces, and urban forms that contribute to their overall character and livability.

  - **Policy UD-1.9:** The City shall protect well-defined existing street patterns and require new development and redevelopment projects to create walkable, pedestrian-scaled blocks, publicly accessible mid-block and alley pedestrian routes where appropriate, and appropriately scaled sidewalks.

  - **Policy UD-1.11**: The City shall promote an urban structure and design that incorporates the open space features of West Sacramento's waterfront, rural landscapes, and parks, including visual access, natural surveillance and development that complements the natural environment.

- **Goal UD-4**: To create durable, safe, and attractive streetscapes that support business activities, reinforce a sense of place, and make walking an attractive choice for moving within the city.
    - **Policy UD-4.1:** The City shall ensure that streetscape design contributes to and defines the overall character of surrounding districts, neighborhoods, centers, and corridors.
    - **Policy UD-4.8:** The City shall require that new roadways and roadway improvement projects include planting strips and landscaped medians sized for canopy trees.
    - **Policy UD-4.9**: The City shall encourage streetscapes to include green street features that capture and absorb stormwater runoff and create attractive natural urban greenspaces.

Scenic Resources

- **Goal NCR-8:** To protect significant scenic resources
    - **Policy NCR-8.1:** The City shall protect scenic vistas from obstructions and visual clutter where it would negatively affect the public's reasonable use and enjoyment of the resources.
    - **Policy NCR-8.2:** The City shall require new development to be sited and designed to visually complement the natural environment, which include features such as the Sacramento River, Sacramento Deepwater Ship Channel, agricultural fields, and other natural landscapes.
    - **Policy NCR-8.3:** The City shall require project designs, lighting configurations, and operational practices that reduce light pollution and preserve views of the night sky.
    - **Policy NCR-8.4:** The City shall minimize obtrusive light by limiting outdoor lighting that is not necessary for public safety, and/or is misdirected or excessive.
    - **Policy NCR-8.5:** The City shall require new development to incorporate design features that prevent excessive glare.

Southport Framework Plan. The City of West Sacramento's Southport Framework Plan (City of West Sacramento 1998) and associated Design Guidelines (City of West Sacramento 2005) include guidelines and design standards that establish how the Southport planning area will look and function. The framework plan's intent is to create "a strong sense of place through a number of communitywide design elements."

West Sacramento Municipal Code.[5] The West Sacramento Municipal Code includes regulations related to zoning and lighting that are applicable to the proposed project and related to aesthetics and scenic quality.

[5] City of West Sacramento. 2024. *Code of Ordinances, Zoning Code (Municipal Code Title 17). Chapter 17.08 Residential Zones.* Website: https://www.cityofwestsacramento.org/home/showpublished document/19017/638585485579370000 (accessed February 2026).

- **Section 17.22.080 Lighting and Illumination.** The West Sacramento Municipal Code requires the following:

    - **General Requirements.** Outdoor lighting shall be designed to be an integral part of the built environment, reflecting a balance for the lighting needs with the contextual ambient light level and surrounding nighttime characteristics of the community while still employing Crime Prevention Through Environmental Design (CPTED) principles. Lighting for commercial installations adjacent to or near residential uses shall be compatible with and not directly illuminate nearby residential uses.

    - **Fixture Types.** All luminaries shall meet the most recently adopted criteria of the Illuminating Engineering Society of North America (IESNA) for "Cut Off" or "Full Cut Off" luminaries.

    - **Design of Fixtures.** Fixtures shall be appropriate to the style and scale of the architecture. Fixtures on building shall be attached only to walls or eaves, and the top of the fixture shall not exceed the height of the parapet, roof, or eave of the roof.

    - **Timing Controls.** All outdoor lighting in non-residential development shall be on a time clock or photo-sensor system and turned off during daylight hours and during hours when the building or, in the case of shopping centers, all buildings, are not in use and the lighting is not required for security.

    - **Light Trespass.** All lights shall be directed, oriented, and shielded to prevent light trespass or glare onto adjacent properties. The light level at property lines shall not exceed 0.3 foot-candles.

West Sacramento Tree Preservation Ordinance. The West Sacramento Tree Preservation Ordinance (Chapter 8.24) establishes regulatory standards for the protection, removal, and replacement of trees within the city. The ordinance applies to public and private properties and aims to preserve valuable tree resources for their ecological, aesthetic, and community benefits. Section 8.24.010 outlines the purpose of the ordinance, which is to prevent the unnecessary removal of significant trees and ensure their protection during development activities. Under Sections 8.24.040 and 8.24.050, a Tree Permit would be required for the removal or substantial pruning of protected trees, or for construction activities within one foot of a tree's drip line. Section 8.24.060 requires applicants to submit a Tree Protection Plan, often prepared by a certified arborist, which includes measures such as fencing, mulching, and root protection to minimize construction impacts. Section 8.24.070 through 8.24.090 detail mitigation requirements for tree removal, including in-kind replacement on an inch-for-inch basis or payment of in-lieu fees if replanting is infeasible. Exemptions apply to trees that are dead, diseased, or hazardous. Enforcement provisions in Section 8.24.100 authorize the City to issue penalties or stop-work orders for violations, with the Tree Administrator serving as the lead

enforcement authority. Overall, the ordinance ensures that tree resources are preserved and integrated thoughtfully into the City's growth and development.[6]

4.1.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the proposed project would have a significant adverse impact with respect to aesthetics if it would:

Threshold 4.1.1: Have a substantial adverse effect on a scenic vista;

Threshold 4.1.2: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;

Threshold 4.1.3: In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality; or

Threshold 4.1.4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

4.1.6 Project Impacts

Potential impacts to aesthetics are discussed below.

Threshold 4.1.1: Would the project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. Development projects have the potential to impact scenic vistas in two ways: (1) a development could physically alter a designated scenic resource (e.g., disturb or develop upon a ridgeline, hillside, or other designated scenic resource), or (2) could block a view corridor or "vista" of the scenic resource from public view. Important factors in determining whether a project would block scenic vistas include the project's proposed height, mass, and location relative to surrounding land uses and travel corridors.

According to the City's General Plan Update Draft EIR,[7] scenic vistas of particular concern include views from elevated vantage points available from levee roadways and crowns that include views of the Sacramento skyline and the Vaca Mountains. The project site is located on five parcels that are currently undeveloped and surrounded on three sides by fully developed residential areas. Views to the north and south consist primarily of residential development, to the east agricultural lands and

[6] City of West Sacramento. 2015. *Code of Ordinances. Chapter 8.24 Tree Preservation*. Website: http://qcode.us/codes/westsacramento/view.php?topic=8-8_24&showAll=1&frames=on (accessed June 26, 2026).

[7] City of West Sacramento. 2016. *General Plan Update: Draft Environmental Impact Report,* August. SCH 2015082061. Website: https://www.cityofwestsacramento.org/home/showpublisheddocument/6444/636445527395230000 (accessed February 2026).

agricultural facilities, and to west views would consist of the existing retention pond which is part of the Bridgeway Lakes Community Park, and the Bridgeway Lakes residential development. Moreover, views through the site are currently largely unobstructed, providing visual continuity between the surrounding residential and agricultural landscapes.

Construction of the proposed project would introduce new one- and two-story single-family residences, which would not exceed 30 feet tall. As part of the proposed project, two types of residences would be constructed: the Sohna Residences, located primarily in the central and northern portions of the site, and the Khote Estates, located along the southern and southwestern edges adjacent to the existing Bridgeway Lakes community. The Sohna Residences would be one- and two-story single-family homes on lots ranging from 5,000 to 7,000 square feet, while the Khote Estates would be single-story estate-style homes on larger lots ranging from 7,200 to 14,800 square feet. Development of the proposed project would alter existing views from the north, south, east, and west as follows:

North: From Marshall Road, viewers currently look south across the site, which consists primarily of an open field with low vegetation. The existing single-family residences located south of the project site are perceptible but of sufficient distance (approximately 0.30 mile) that they do not dominate the viewshed. Foreground views are primarily of the undeveloped project site. Upon project implementation, the new one- and two-story residences would occupy the foreground and midground, obstructing views across the site. Landscaping and building setbacks would soften the visual impact, but the existing open character of the project site as an open field would be replaced by the proposed residential development.

South: From the existing residences in the neighborhood south of the project site and surrounding roadways, viewers currently look north across the open field that currently dominates the project site. Foreground and midground views are also predominantly of the open field on the undeveloped project site, with distant views of the existing single-family residential neighborhood to the north. Upon project implementation, the new one-story residences would be located on the south side and have a maximum height of 20 feet. These residents would occupy the foreground and midground, partially obstructing views across the site. Landscaping and building setbacks would help soften the visual impact, but the existing open character of the project site as an open field would be replaced by the proposed residential development.

East: From Otis Avenue, viewers currently look west across the project site, which consists of an open field with low vegetation. Foreground and midground views are dominated by the undeveloped project site, while in the distance views are divided by the existing Bridgeway Lakes Community Park to the northwest and residential development to the southwest. The view of the Bridgeway Lakes Community Park is dominated by existing trees and landscaping along the property edges and the residential development is of sufficient distance (approximately 0.30 mile) that it does not dominate the viewshed. Upon project implementation, the proposed one- and two-story residences would occupy the foreground and midground, partially obstructing views across the site. Landscaping and building setbacks would help soften the visual impact; however, the introduction of proposed development would reduce the perception of openness and alter the visual connection between Otis Avenue and the distant park and residential area.

West: From the Bridgeway Lakes Community Park and adjacent residential development, viewers currently look east across the site, which consists primarily of an open field with low vegetation. Foreground and midground views are dominated by the undeveloped project site, while distant views of agricultural lands to the east are largely obscured due to the distance. Upon project implementation, the proposed one- and two-story residences would occupy the foreground and midground, partially obstructing views across the site. Landscaping and building setbacks would help soften the visual impact, but the open character of the site would be reduced, and the perception of an open field would be replaced by the proposed residential development. Distant agricultural lands to the east would remain generally imperceptible from this vantage point, making the proposed development the primary visual element within the viewshed.

In addition, these residences would be constructed approximately 0.54 mile to the west of the Sacramento River Deep Water Ship Channel, which is characterized as an important visual feature in the City's General Plan Update Draft EIR;[8] however, the elevation of the proposed project and maximum height of the proposed residences would not obstruct views of this channel, the Vaca Mountains, or the Sacramento skyline.

While construction of the proposed project would represent a change in the visual character of the project site, the General Plan has not identified the proposed project site or surrounding area as a scenic or visual resource, nor would the proposed project obstruct views of a scenic vista. Future homes associated with the proposed project would represent a continuation of the existing design theme and general character of the surrounding residential uses to the north, south and west and would be visually cohesive with the surrounding landscape. Therefore, development of the proposed project would have a **less than significant** impact on scenic vistas, and no mitigation is required.

Threshold 4.1.2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. There are no officially listed State Scenic Highways or highways eligible for listing in the vicinity of the project site or in West Sacramento.[9] The nearest State highways that are eligible for designation as a State Scenic Highway include a portion of State Route 160 (SR-160) that is 5.6 miles southeast of the project site. Due to distance, topography, and intervening development, no portion of the project site or the surrounding area is visible from the officially designated portion of SR-160. Additionally, scenic resources, such as rock outcroppings and historic buildings, do not exist on the project site. All previous structures on the site have since been demolished. The perimeter of the project site also contains numerous shrubs and several ornamental trees; however, because the project site is not visible from a designated State scenic highway, impacts to the views of on-site trees would be negligible. Therefore, the proposed project would not substantially damage scenic

8 City of West Sacramento. 2016. *General Plan Update: Draft Environmental Impact Report,* August. SCH 2015082061. Website: https://www.cityofwestsacramento.org/home/showpublisheddocument/6444/636445527395230000 (accessed February 2026).

9 California Department of Transportation (Caltrans). n.d. California Scenic Highway Mapping System. Website: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa (accessed February 2026).

resources, including but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway. **No impact** would occur, and no mitigation is required.

Threshold 4.1.3: In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from publicly accessible vantage point)? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

***Less Than Significant Impact*.** As stated, above in Section 4.1.3.1, Local Context, the City is located in an Urbanized Area, as defined by CEQA Guidelines Section 15387. Therefore, the relevant threshold is would the project conflict with applicable zoning and other regulations governing scenic quality.

The proposed project would result in the development of new one- and two-story residences that would alter the existing visual character of the project site. However, the visual character and quality of the project site and the surrounding area would be governed through the application of the architectural and landscape design guidelines outlined in the Southport Framework Plan Design Guidelines[10] and the neighborhood design guidelines created for the proposed project as outlined Chapter 3.0, Project Description. Furthermore, the proposed project would be required to adhere to applicable city regulations governing scenic quality, including the design and aesthetic goals and policies in the City's General Plan, [11] the Southport Framework Plan and Design Guidelines,[12] and the City's Zoning Code,[13] as specified in Section 4.1.4.4, Local Regulations. Additionally, the proposed project would support General Plan Policy LU-1.1, which encourages compact development that efficiently uses land; Policy LU-3.6, which calls for new development to provide sensitive transitions and respect existing neighborhood character; and Policy LU-3.7, which promotes the creation of well-defined residential neighborhoods designed around focal points such as parks or schools.

As discussed in Chapter 3.0, Project Description, the project site is currently designated as Rural Estate (RE) in both the City's General Plan and the Southport Framework Plan. The RE land use designation is intended for the development of single-family detached homes, secondary residential units, limited agricultural uses, public and quasi-public uses, and similar and compatible uses in a rural setting. The maximum residential density allowed within the RE designation is one dwelling unit for every 2.5 acres.[14] The project site is currently zoned as Residential Rural Estates (RE). According

10 City of West Sacramento. 1994. *Southport Framework Plan.* March. Website: https://ceqanet.opr.ca.gov/1991063032/2 (accessed February 2026).

11 City of West Sacramento. 2024. *General Plan 2035.* January. Website: https://www.cityofwestsacramento.org/government/departments/community-development/planning-division/general-plan-2035 (accessed February 2026).

12 Ibid.

13 City of West Sacramento. 2024. *Zoning Code (Municipal Code Title 17).* Chapter 17.08 Residential Zones. Website: https://www.cityofwestsacramento.org/home/showpublisheddocument/19017/638585485579370000 (accessed February 2026).

14 City of West Sacramento. 2024. *General Plan 2035.* January. Website: https://www.cityofwestsacramento.org/government/departments/community-development/planning-division/general-plan-2035 (accessed February 2026).

to the City's Zoning Code,[15] the Residential RE zoning district is intended to provide for residential development on large lots. The Residential RE zoning district allows for development of up to one residential dwelling unit per 2.5 acres, and allows for detached single-family dwelling units, accessory dwelling units, limited agricultural uses, public and quasi-public uses, and other uses that may be appropriate in a rural residential area. To maintain consistency with the City's General Plan and the Southport Framework Plan, the proposed project would require an amendment to the City's General Plan and the Southport Framework Plan to change the land use designation from RE to Low Density Residential (LR). It would also require a Zoning Map/Code amendment to rezone the site from RE to Residential One Family (R-1-A). According to the City's General Plan, the LR designation is intended to provide for single-family detached and attached homes, secondary residential units, public and quasi-public uses, and similar compatible uses, allowing a maximum residential density of 6.0 dwelling units per acres (DUA). Additionally, the City's Zoning Code designates the R-1-A zoning district for single-unit dwellings while preserving the characteristics of existing single-unit neighborhoods. The R-1-A zoning district also permits public and quasi-public uses, as well as other compatible uses suited for a medium-density residential environment, with allowed residential densities ranging from 1.1 to 6.0 DUA. Accordingly, these amendments would allow and require the project to be consistent with the City's Zoning Code and planning documents governing the project site. Therefore, the proposed project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be **less than significant**, and no mitigation is required.

Threshold 4.1.4: Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. Currently, lighting is produced by surrounding residential development, street lighting, and vehicles operating at night on adjacent roadways, including Marshall Road and Otis Avenue. Under existing conditions, the project site is undeveloped and vacant and there are no sources of light or glare present on the project site. Sources of light and glare in the surrounding area include street lighting and vehicles traveling on both Otis Avenue and Marshall Road as well as residential lighting on adjacent properties to the east and south. Local roadways are lit and well-traveled by vehicles. Light from residential uses in the surrounding area is also visible to the north, east, and south of the project site. Light-sensitive uses in proximity to the project site include the residential uses located to the north, south, and east of project site, across Marshall Road, respectively.

Construction. As discussed in Section 4.13, Noise, and described in **Mitigation Measure NOI-1**, construction activities would be limited to the hours of 7:00 a.m. to 7:00 p.m., Monday through Saturday, consistent with City's Draft Noise Ordinance.[16] Accordingly, there would be little to no lighting associated with the use of construction equipment and vehicles on the project site outside these times. Construction-related illumination on the project site would be downlit, and construction activities would be temporary, only occurring for the duration of the construction

[15] City of West Sacramento. 2024. *Zoning Code (Municipal Code Title 17). Chapter 17.08 Residential Zones.* Website: https://www.cityofwestsacramento.org/home/showpublisheddocument/19017/638585485579370000 (accessed February 2026).

[16] City of West Sacramento. 2026. *Draft Noise Ordinance.* Personal communication with Daniel Berumen. July 23.

process. Light resulting from construction activities would not substantially impact sensitive uses, substantially alter the character of surrounding uses or interfere with the performance of off-site activities. In addition, construction activities are not anticipated to use equipment or materials with flat, shiny surfaces that would reflect sunlight or cause other natural glare. Minor glare from sunlight on construction equipment and vehicle windshields is not anticipated to impact visibility in the area as the construction sites would be fenced and shielded from pedestrian and vehicular views. While construction activities and associated vehicle trips would not take place after 7:00 p.m., during certain times of the year, particularly in the fall and winter months when daylight hours are shorter, these activities would occur under reduced light conditions. Nevertheless, construction activities would be temporary in nature and would not be expected to require substantial permanent lighting or create a substantial source of glare. Therefore, construction of the proposed project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area, and light and glare impacts associated with construction would be **less than significant**. No mitigation is required.

Operation. Development of the proposed project would introduce new sources of light on the project site and in the surrounding area through the development of the proposed future residential uses. The proposed future development would include the installation of 14-foot pedestrian-scaled streetlights along residential local streets and 28-foot primary streetlights on residential collector streets and along Marshall Road and Otis Avenue.

All external lighting, including residential lighting would use energy-efficient light-emitting diode (LED) fixtures. Additionally, lighted bollards would be installed throughout the parklet and the Central Park to provide illumination at the pedestrian scale. Lighting associated with the proposed project would be consistent with City standards, and all lighting on the project site would comply with Section 17.22.080, Lighting and Illumination, of the City's Municipal Code, which requires that all lighting comply with the requirements in the Illuminating Engineering Society of North America (IESNA) for "cut off" or "full cut off" luminaries, functional and aesthetic design, and light shielding to prevent light trespass or glare onto adjacent properties. The purpose of these lighting standards is to minimize light pollution, glare, and spillover, conserve energy resources, and curtail the degradation of the nighttime visual environment.

Although the proposed project would increase the overall intensity of on-site land uses and associated lighting, the increase in lighting would not result in substantial increases in light intensity at off-site locations. In addition, light intensity diminishes rapidly as an observer moves away from the light source. Accordingly, the intensity of project-related lighting would be concentrated on site with little potential to create perceptible changes in ambient lighting intensity at off-site, light-sensitive locations.

Daytime glare can result from natural sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces. The proposed development is assumed to incorporate a variety of building materials, which would primarily be non-reflective materials (i.e., neutral colors and a variety of materials, such as tile, cement, plaster, and wood). Therefore, these materials would not have the potential to produce a substantial degree of glare.

Nighttime lighting and glare sources from the proposed project could also include lighting from interior and exterior building lighting, lighted bollards throughout the parklet and the Central Park, and vehicle headlights. The nighttime glare produced by these sources would be similar to the existing nighttime glare produced by the surrounding, residential uses and would not result in enough glare to be considered substantial or affect nighttime view because lighting would be required to meet all applicable lighting standards in the City's Municipal Code.

For these reasons, the proposed project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the surrounding urban area, and project impacts would be **less than significant**. No mitigation is required.

4.1.7 Cumulative Impacts

***Less Than Significant Impact*.** As defined in Section 15355(b) of the *State CEQA Guidelines*, cumulative impacts refer to the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. The cumulative study area for aesthetics is described in Chapter 4.0, the cumulative project list is provided in **Table 4.A**, and a map of the cumulative project locations is provided in **Figure 4-1**.

As stated above under Thresholds 4.1.1 through 4.1.3, the proposed project would have less than significant impacts on scenic vistas, no impacts on scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway, and no impacts related to conflicts with applicable zoning and other regulations governing scenic quality. Cumulative projects in the vicinity of the proposed project include cumulative projects 4, 7, 14, and 22. Similar to the proposed project, each of these cumulative projects would be located in a semi-rural area within West Sacramento as they are surrounded by agricultural lands. However, because the proposed project and these nearby cumulative projects would occur in an area already planned for residential development consistent with the City's General Plan and design standards, the proposed project would not contribute to a cumulatively considerable impact on scenic vistas, scenic resources within a State Scenic Highway, or conflicts with applicable zoning and other regulations governing scenic quality. Therefore, cumulative impacts would be less than significant, and no mitigation is required.

As stated above under Threshold 4.1.4, although development of the proposed project would add a new source of light of and glare to an undeveloped site, the project area is located within an urbanized area and is surrounded by residential uses with urban lighting characteristics and is adjacent to Marshall Road and Otis Avenue. Additionally, upon development of the proposed project, all operational lighting would comply with Section 17.22.080, Lighting and Illumination, of the City's Municipal Code which would ensure that project-related light and glare impacts would be less than significant. Additionally, consistent with the City's Draft Noise Ordinance,[17] construction activities would be limited between the hours of 7:00 a.m. and 7:00 p.m. Construction-related

[17] City of West Sacramento. 2026. *Draft Noise Ordinance.* Personal communication with Daniel Berumen. July 23.

illumination would be downlit, and construction activities would be temporary, ensuring that construction-related light and glare impacts would be less than significant.

Accordingly, the proposed project and nearby related projects, including those listed above, would not substantially alter the existing light and glare currently experienced in the area. In addition, cumulative lighting would not be expected to interfere with the performance of offsite activities given the existing light levels already present. Furthermore, the cumulative projects as well as the proposed project would be required to comply with existing regulatory requirements related to light and glare including Title 24 and the City's Municipal Code to reduce potential impacts associated with light and glare and if significant light and glare impacts are anticipated, appropriate mitigation measures would be implemented as part of the CEQA environmental review process. Therefore, the proposed project would not result in cumulatively considerable impacts related to light and glare. Cumulative impacts would be **less than significant**, and no mitigation is required.

4.1.8 Level of Significance Prior to Mitigation

The proposed project would result in less than significant impacts related to aesthetics.

4.1.9 Regulatory Compliance Measures and Mitigation Measures

4.1.9.1 Regulatory Compliance Measures

There are no regulatory compliance measures applicable to the proposed project pertaining to aesthetics.

4.1.9.2 Mitigation Measures

The proposed project would result in less than significant impacts related to aesthetics, and no mitigation is required.

4.1.10 Level of Significance after Mitigation

The proposed project would result in less than significant impacts related to aesthetics.

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4.2 AGRICULTURE AND FORESTRY RESOURCES

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for the proposed Brar Farms Residential Development Project (proposed project) to impact agriculture and forestry resources in the City of West Sacramento (City) using methodologies and assumptions from the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP), the United States Department of Agriculture (USDA), and the Natural Resources Conservation Service (NRCS), as well as applicable provisions of both the City and County of Yolo's (County) General Plans.

4.2.1 Scoping Process

Some comments received during the scoping period addressed agriculture and forestry resources. These comments raised concerns about the conversion of agricultural land, loss of agricultural soils, and the proposed project's inconsistency with the agricultural character of the area.

4.2.2 Methodology

Impacts to agriculture and forestry resources were assessed based on documents and maps from the DOC, the County Agricultural Commissioner's Office, and the City's General Plan. Impacts to agricultural resources were determined based on the proposed project's potential to affect farmland,[1] land used or zoned for agricultural purposes, or lands subject to historical or current Williamson Act contracts.

Impacts to forestry resources were considered based on the proposed project's potential to convert or accelerate deterioration of forestry resources. The *California Forests and Rangelands 2017 Assessment* defines forests as "a biological community of plants and animals that is dominated by tree and other wood plants; by definition in the Assessment, all lands with greater than 10 percent tree canopy cover including all California Wildlife Habitat Relationship types in the Conifer Forest, Conifer Woodland, Hardwood Forest and Hardwood Woodland land cover classes."[2]

Section 12220(g) of the Public Resources Code defines forest land as "land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits."

This information was used in this section of the Draft EIR to assess potential impacts to agricultural and forestry resources within the proposed project. Impacts that could result from implementation

1 "Farmland" is defined as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on maps prepared pursuant to the FMMP of the California Resources Agency.

2 California Department of Forestry and Fire Protection. (CAL FIRE). 2017. Fire and Resource Assessment Program. *California's Forests and Rangelands 2017 Assessment*. pg. 286. Website: https://frap.fire.ca.gov/media/3180/assessment2017.pdf (accessed February 2026).

of the proposed project were evaluated qualitatively based on existing conditions within the project area,[3] expected construction practices, and operational activities.

4.2.3 Existing Environmental Setting

The proposed project is located in West Sacramento, Yolo County, California. This section discusses the status of agricultural resources in Yolo County, West Sacramento, and on the project site.

4.2.3.1 Yolo County

Agricultural Resources. According to the DOC, approximately 522,944 acres of land in Yolo County are designated as agricultural land as of 2020.[4] According to the Yolo County General Plan,[5] over 85 percent of county land is used for agriculture. The total acreage includes a mix of large-scale and small-scale farms as well as livestock operations. The top ten commodities produced in Yolo County in 2020 were tomatoes, grapes (wine), almonds, rice, organic production, sunflower seed, walnuts, alfalfa hay, nursery products, and olives (oil).[6] In addition to these commodities, the County also produces apiary products, cattle and calves, wheat, pistachios, pasture and grass seed, corn (field), prunes, hay (grain), and vine seed.[7]

Yolo County's landscape is dominated by irrigated agriculture, predominately alfalfa and rice crops. Yolo County's agricultural economy is driven by fruit crops with tomatoes and wine grapes being the most profitable, along with others such as almonds, walnuts, cattle and calves, and wheat.[8] Many traditional large-scale growers share their land with a number of small, diversified farms and livestock operations. Fertile soils, a reliable water source, and a mild climate supporting longer growing seasons allow Yolo County's agricultural industry to drive its economy. The Yolo County General Plan's Agriculture and Economic Development Element describe the types of soils and their suitability for a range of uses with the NRCS Land Capability Classification system and the DOC FMMP.[9] The NRCS land capability classes are categorized by numbers I through VII, with progressively greater limitations and fewer choices for agricultural uses. Class I soils have the least limitations that restrict their use, whereas Class VII soils have very severe limitations that make them unsuitable for cultivation and restrict their use mainly to grazing, forestland and/or wildlife habitat. The project site is nearly surrounded by agriculture fields with Class I designated soils.[10] According to the FMMP data (2020), there are more than 357,284 acres of Important Farmland in Yolo, county

[3] As described in Chapter 3.0 of this Draft EIR, the baseline condition generally consists of the existing conditions on and in the vicinity of the project site at the time the Notice of Preparation (NOP) was published (September 10, 2025).

[4] California Department of Conservation, Division of Land Resources Protection. 2020. Farmland Mapping and Monitoring Program. Yolo County 2018–2020 Land Use Conversion. Table A-24.

[5] County of Yolo. 2009. *County of Yolo 2030 Countywide General Plan Agriculture and Economic Development Element*. November.

[6] County of Yolo. 2020. *Yolo County Agricultural Crop Report.* Website: https://www.yolocounty.gov/home/showpublisheddocument/71737/638423912174930000 (accessed February 2026).

[7] *Ibid.*

[8] *Ibid.*

[9] *Ibid.*

[10] United States Department of Agriculture. Natural Resources Conservation Service. 2025. Web Soil Survey Map. Website: https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx (accessed February 2026).

combined. In addition, there are more than 165,660 acres of Grazing Land in Yolo County. Please also refer to **Figure 4.2-1: Yolo County Important Farmland**, which shows the types of farmland within Yolo County.

Although Yolo County has policies to protect agricultural lands, according to DOC farmland conversion reports, Important Farmland conversion continues to occur. **Table 4.2.A: Yolo County Agricultural Land Conversion 2018–2020,** presents changes in acreages of Important Farmland and Grazing Land between 2018 and 2020. Population growth and associated pressure for rural "ranchettes" and urban development primarily drive the loss of Important Farmland; however, losses also can occur if land goes into habitat conservation or confined animal facilities. Gains in Important Farmland also can occur, for example, when grazing land goes into crop production (e.g., increased area planted to almonds). Nevertheless, the San Joaquin Valley, including portions of Yolo County, is one of the leading regions in the State losing Important Farmland to urban or other nonfarming uses.

Table 4.2.A: Yolo County Agricultural Land Conversion 2018–2020

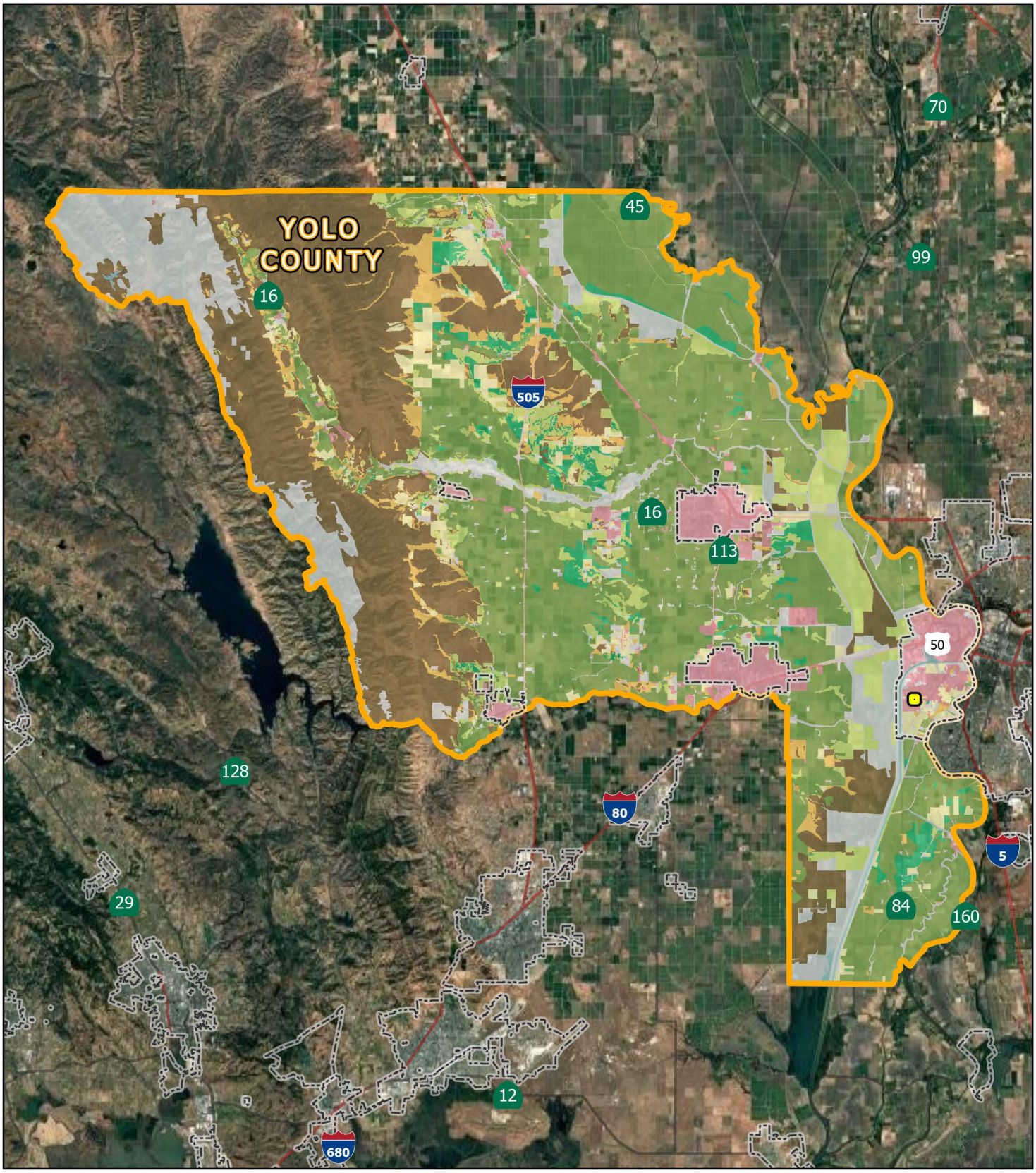
Land Use Category	Total Acreage Inventoried		2018–2020 Acreage Changes		
	2018	2020	Acres Lost (-)	Acres Gained (+)	Net Acreage Changed
Prime Farmland	243,962	243,748	1,259	1,045	-214
Farmland of Statewide Importance	19,321	19,985	118	782	664
Unique Farmland	43,932	44,467	321	856	535
Farmland of Local Importance	49,728	49,084	2,731	2,087	-644
Important Farmland Subtotal	**356,943**	**357,284**	**4,429**	**4,770**	**341**
Grazing Land	165,921	165,660	520	259	-261
Agricultural Land Subtotal (Important Farmland + Grazing Land)	**522,864**	**522,944**	**4,949**	**5,029**	**80**
Urban and Built-Up Land	31,352	31,732	35	415	+380
Other Land	95,000	94,527	770	297	-473
Water Areas	4,233	4,246	0	13	13
Total Area Inventoried	**653,449**	**653,449**	**5,754**	**5,754**	**0**

Source: California Department of Conservation, Division of Land Resources Protection, Farmland Mapping and Monitoring Program. Table A-24, Yolo County 2018–2020 Land Use Conversion (DOC 2020).

The most recent agricultural land conversion data available for Yolo County is for the 2018–2020 period and was obtained through the DOC FMMP.[11] Land converted in this period is shown in **Table 4.2.A**.

[11] California Department of Conservation, Division of Land Resources Protection. 2020. *Farmland Mapping and Monitoring Program. Yolo County 2018–2020 Land Use Conversion,* Table A-24.

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LSA

Project Site
County Boundary
City Boundary

Prime Farmland
Farmland of Statewide Importance
Unique Farmland
Grazing Land
Farmland of Local Importance
Farmland of Local Potential
Other Land

Urban and Built-Up Land
Water Area

FIGURE 4.2-1

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SOURCE: Google Maps (2024)

Brar Farms Residential Development Project
Yolo County Important Farmland

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In summary, for the two-year period from 2018 to 2020, the total amount of Important Farmland inventoried increased by 341 acres, and the total amount of agricultural land that was inventoried in the County increased by 80 acres.

Table 4.2.B: Yolo County Agricultural Production Value 2018 versus 2023,[12] shows the value of agricultural production in 2018 versus 2023 and provides a percent of change between these years.

Table 4.2.B: Yolo County Agricultural Production Value 2018 versus 2023

Agricultural Category	2018 Value	2023 Value	Percent Change
Fruit and Nut Crops	$179,245,000	$209,898,000	17.10%
Vegetable Crops	$124,626,000	$268,336,000	115.31%
Field Crops	$129,393,000	$137,489,000	6.25%
Wine Grapes	$83,596,000	$101,383,000	21.28%
Organic Production	$48,525,000	$63,898,000	31.68%
Seed Crops	$54,921,000	$45,137,000	-17.81%
Nursery Products	$19,687,000	$26,752,000	35.88%
Apiary, Livestock and Poultry Products	$15,362,000	$48,969,000	218.77%
Total	**$655,355,000**	**$901,862,000**	**37.61%**

Source: Yolo County Agricultural Commissioner's Office. (n.d.)

Most commodities experienced an increase in value, whereas seed crops experienced a decrease in value. The total agricultural production value in Yolo County increased by 37.6 percent between 2018 and 2023.

Forestry Resources. Yolo County has no commercial forestland or timber resources.[13] Forests and forestlands are addressed in the County General Plan Conservation and Open Space Element only as related to woodland habitats and "urban forestry."

4.2.3.2 City of West Sacramento

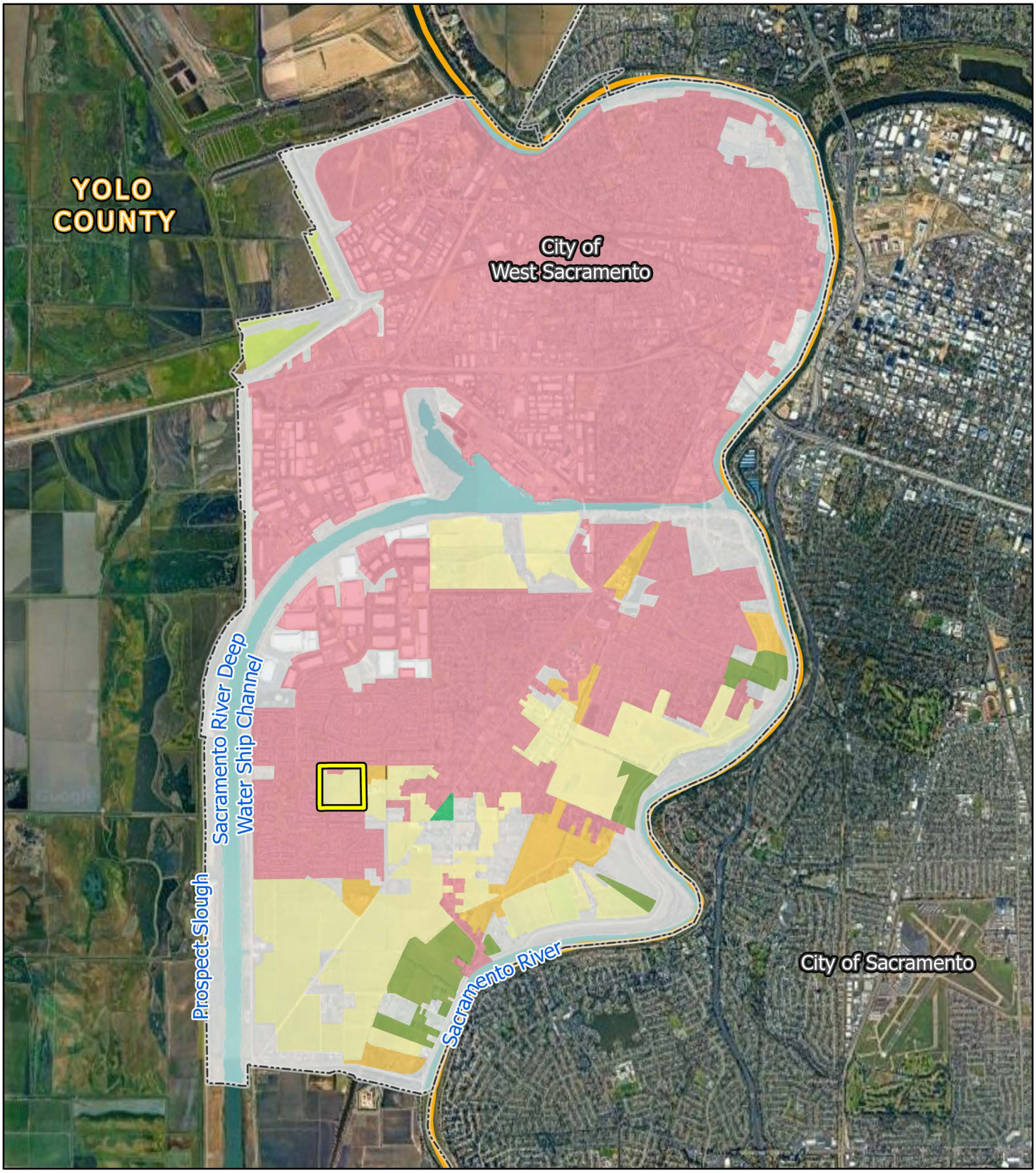
Agricultural Resources. West Sacramento contains land that remains in agricultural production and is surrounded by productive farmland. The City's General Plan designates two areas within the city as agricultural: the area of Southport generally south of Bevan Road and a small part of the Yolo Bypass at the western edge of the City, immediately north of West Capitol Avenue and south of Southern Pacific railroad tracks. These areas, in addition to areas with other general plan land use designations, are used for farming. Key crops include wheat, alfalfa, fruits, and vegetables.[14] Please also refer to **Figure 4.2-2: City of West Sacramento Important Farmland**, which shows the types of farmland within the City.

12 The 2023 Yolo County Agricultural Production Value data are from the most current year available from the Yolo County Agricultural Commissioner's Office.

13 County of Yolo. 2009. *County of Yolo 2030 Countywide General Plan Conservation and Open Space Element.* November

14 City of West Sacramento. 2016. *City of West Sacramento General Plan 2035 Natural and Cultural Resources Element.* Page 2-108. Website: https://www.cityofwestsacramento.org/home/showpublished document/2598/636400844095200000 (accessed February 2026).

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LSA

Project Site
County Boundary
City Boundary

Urban and Built-Up Land
Grazing Land
Farmland of Local Importance
Farmland of Local Potential
Prime Farmland
Farmland of Statewide Importance
Unique Farmland

Water Area
Other Land

FIGURE 4.2-2

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SOURCE: Google Maps (2024)

Brar Farms Residential Development Project

City of West Sacramento Important Farmland

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Forestry Resources. West Sacramento does not have a land use designation for forests and forestry resources. There are no designated forestry resources within the City.

4.2.3.3 Project Site

Historically, the project site was the location of H&H Nishimura Farms and was used for agricultural purposes. According to the DOC FMMP, the project site is primarily designated as Farmland of Local Importance. The northernmost portions of the project site also include Farmland of Local Potential, and Urban/Built-Up Land;[15] however, the project site is not under a Williamson Act contract nor a Farmland Security Zone (FSZ) contract. The City's General Plan currently designates the project site as Rural Estate (RE), and the project site is zoned Residential Rural Estates (RE). As described in Chapter 17.08, Residential Zones, of the City's Municipal Code, the RE zoning district allows crop production by right and is intended to provide residential development on large lots that transition between agricultural lands and residential-designated lands. The project site is currently used for hay production by a volunteer farmer on a seasonal basis. There is no forest land or timberland production, or resource management on the project site. Please also refer to **Figure 4.2-3: Farmland within the Project Site**, which shows the types of farmland within the project site.

4.2.4 Regulatory Setting

Federal, State, and local regulations and programs related to agriculture and forestry resources that are applicable to the proposed project are described below.

4.2.4.1 Federal Regulations

There are no federal regulations that apply to the proposed project with respect to agriculture or forestry resources.

4.2.4.2 State Regulations

California Department of Conservation Farmland Mapping and Monitoring Program. In 1982, the DOC began coordinating with the USDA Soil Conservation Service in the preparation and completion of Important Farmland mapping for California through the establishment of the FMMP. The FMMP created a greater level of mapping compared to the USDA Soil Conservation Service by modifying the federal criteria for use in California and incorporating irrigation criteria for farmland significance. The primary purpose of the FMMP is to monitor the conversion of California's agricultural lands. The DOC Division of Land Resource Protection works with landowners, local governments, and researchers to conserve California's farmland and open space resources based on information provided in the FMMP.

[15] California Department of Conservation. 2022. California Important Farmland Finder. Website: https://maps.conservation.ca.gov/DLRP/CIFF/ (accessed February 2026).

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Project Site

Urban and Built-Up Land (5.92 acres)

Farmland of Local Importance (50.18 acres)

Farmland of Local Potential (2.24 acres)

FIGURE 4.2-3

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SOURCE: Google Maps (2024)

Brar Farms Residential Development Project

Farmland Within the Project Site

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The DOC FMMP produces maps and statistical data used for analyzing impacts on agricultural resources. Agricultural land is categorized according to soil quality and irrigation status. The maps are updated every two years through review of aerial photographs, a computer mapping system, public review, and field reconnaissance. The latest statewide data available are from 2018. The FMMP categories are defined as follows:

- **Prime Farmland:** This land category has the best combination of physical and chemical features for sustaining long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce crops with sustained high yields. The land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

- **Farmland of Statewide Importance:** This land category is similar to Prime Farmland but with minor shortcomings (e.g., greater slopes or less ability to store soil moisture). The land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

- **Unique Farmland:** This land category consists of lesser quality soils used for the production of the State's leading agricultural crops. This land is usually irrigated but may include non-irrigated orchards or vineyards. The land must have been cropped at some time during the 4 years prior to the mapping date.

- **Farmland of Local Importance:** This land category is important to the local agricultural economy as determined by each county's Board of Supervisors and a local advisory committee.

- **Grazing Land**: This land category is occupied with vegetation suited to grazing livestock. This land category was developed in cooperation with the California Cattleman's Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities. The minimum mapping unit is 40 acres.

- **Urban and Built-Up Land:** This land category is occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures.

- **Other Land:** This land category consists of land that is not included in any other mapping category. Common examples include low-density rural developments, brush, timber wetland, riparian area not suitable for livestock grazing, and water bodies smaller than 40 acres. Vacant and non-agricultural lands surrounded on all sides by urban development that are greater than 40 acres are mapped as Other Land.

The DOC FMMP considers Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance collectively as Important Farmland.

Williamson Act and Farmland Security Act. The California Land Conservation Act, better known as the Williamson Act, has been the State's most important agricultural land protection program since

its enactment in 1965. Fundamentally, the Williamson Act is a State policy administered by local governments. Local governments are not mandated to administer the act, but those that do have some latitude to tailor the program to suit local goals and objectives.

Williamson Act contracts have a minimum term of ten years, with renewal occurring automatically each year (local governments can establish initial contract terms for longer periods of time). The contracts run with the land and are binding on all successors in interest of the landowner. Only land located within an agricultural preserve is eligible for Williamson Act contracts. An agricultural preserve defines the boundary of an area within which a city or county would enter into contracts with landowners. The boundary is designated by resolution of the board of supervisors or city council having jurisdiction. The rules of each agricultural preserve specify the uses allowed. Generally, any commercial agricultural uses would be permitted within any agricultural preserve. In addition, local governments may identify compatible uses allowed with a use permit.

In August 1998, Senate Bill (SB) 1182 established the FSZ provisions of the Williamson Act. An FSZ is created within an agricultural preserve by County Board of Supervisors' approval and at the request of a landowner or group of landowners. FSZ contracts offer landowners greater property tax reductions in return for an initial contract term of 20 years, with renewal occurring automatically each year. Land restricted by an FSZ contract is valued for property assessment purposes at 65 percent of its Williamson Act valuation, or 65 percent of its Proposition 13 valuation, whichever is lower. New special taxes for urban-related services must be levied at an unspecified reduced rate unless the tax directly benefits the land or living improvements. Cities and special districts that provide non-agricultural services are generally prohibited from annexing land enrolled under an FSZ contract. Similarly, school districts are prohibited from taking FSZ lands for school facilities.

Z'Berg-Nejedly Forest Practice Act. The Z'Berg-Nejedly Forest Practice Act (Forest Practice Act) identifies operating methods and procedures that seek to protect fish, wildlife, forests, and streams within timber harvesting areas. The Forest Practice Act is intended to achieve "maximum sustained production of high-quality timber products…while giving consideration to values relating to recreation, watershed, wildlife, range and forage, fisheries, regional economic vitality, employment and aesthetic enjoyment." The regulations created by the Forest Practice Act define factors such as the size and location of harvest areas, include measures to prevent unreasonable damage to residual trees, and address the protection of riparian areas, water courses and lakes, wildlife, and habitat areas.

Z'Berg-Warren-Keene-Collier Forest Taxation Reform Act. According to the Z'Berg-Warren-Keene-Collier Forest Taxation Reform Act enacted in 1976, counties must provide for the zoning of land used for growing and harvesting timber as Timberland Production Zones (TPZs). TPZs were established to preserve and protect timberland from conversion to other uses and avoid land use conflicts.

Timberland Productivity Act. The Timberland Productivity Act represents the Legislature's declared intent "to fully realize the productive potential of the forest resources and timberlands of the state." This act imposes mandatory restrictions on parcels zoned as timberland production. Such parcels "shall be zoned so as to restrict their use to growing and harvesting timber and to compatible uses." In exchange, property owners are required to pay property taxes on the land based solely on its

value for timber harvest, and not for its development potential, as is the case with qualifying agricultural and open space lands under the Williamson Act. Government Code Section 51104(g) of the Timberland Productivity Act defines "timberland production zone" as an area that has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses. Compatible uses are defined under Section 51104(h) and include management for watershed; management for habitat or hunting and fishing; access roads and staging areas for timber harvesting; gas, electric, water, or communication transmission facilities; grazing; or a residence or other structure necessary for timber management.

4.2.4.3 Regional Regulations

Yolo County General Plan. The County of Yolo General Plan contains goals, policies, and plans intended to guide growth and development of the county.

The following goals and policies from the Agriculture and Economic Development Element of the Yolo County General Plan would be applicable to the proposed project.

- **Goal AG-1:** Preservation of Agriculture. Preserve and defend agriculture as fundamental to the identity of Yolo County.
    - **Policy AG-1.18:** When undertaking improvement of public roadways and drainage facilities, consult with adjoining farmland owners and incorporate designs that minimize impacts on agriculture.

Yolo County Local Agency Formation Commission Agricultural Conservation Policy. The Yolo County Local Agency Formation Commission Agricultural Conservation Policy includes six considerations when reviewing proposals which could induce, facilitate, or lead to the conversion of existing open-space lands to uses other than open space uses. The policy encourages protection for agricultural lands and enforces preservation of agricultural land for agricultural productive uses.

The following guideline provided to promote the policy would be applicable to the proposed project.

- **Policy Guideline A.5**: The continued productivity and viability of agricultural land surrounding existing communities should be promoted, by preventing the premature conversion of agricultural land to other uses and, to the extent feasible, minimizing conflicts between agricultural and other land uses.

4.2.4.4 Local Regulations

City of West Sacramento General Plan. The City of West Sacramento General Plan contains goals, policies, and plans intended to guide growth and development of West Sacramento.

The following policies and goals are included in the Natural and Cultural Resources Element of the General Plan and may be applicable to the proposed project:

- **Goal NCR-1:** To promote the economic viability of agriculture in West Sacramento and to discourage premature development of agricultural land with non-agricultural uses, while providing for urban needs.
    - **Policy NCR-1.1:** The City shall support the continuation of agricultural uses on lands designated for urban uses until urban development is imminent.
    - **Policy NCR-1.2:** The City shall endeavor to ensure, in approving urban development near agricultural lands, that such development will minimize conflicts with adjacent agricultural uses, and not constrain agricultural practices or adversely affect the economic viability of nearby agricultural operations, where feasible.
    - **Policy NCR-1.3:** The City shall encourage the County of Yolo to retain agricultural uses on lands adjacent to the city to create a buffer around the city.

City of West Sacramento General Plan Update Draft EIR. The General Plan Update Draft EIR acknowledges that the City contains areas of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance which are currently being farmed and are planned for urbanization. Accordingly, the future urbanization of those lands would remove them from agricultural production, resulting in the permanent conversion of agricultural land to non-agricultural uses upon buildout of the General Plan. The General Plan Update Draft EIR concluded that this impact would be significant and unavoidable, even with policies to preserve agricultural operations, such as notification requirements to homebuyers and support for the City's right-to-farm ordinance. As detailed in Section 4.2.6, Project Impacts, the farmland within the project site does not meet the criteria of Prime, Statewide, or Unique Farmland.

Southport Framework Plan. The Southport Framework Plan EIR acknowledges development in the Southport area will result in the conversion of prime agricultural lands and that the City's General Plan has indicated the loss of agricultural lands would be a significant adverse impact. The City adopted a statement of overriding considerations for the EIR, which indicated that urban development was of greater benefit to the community than preserving agricultural land within the City limits.[16]

The Southport Framework Plan does not include any goals or policies related to the conservation of agricultural lands as a resource, but Chapter 4, Conservation, Section 4.3, Agricultural Resources, of the Southport Framework Plan specifies that buffer provisions must be made to protect future residents from the effects of adjacent agricultural operations as development occurs. Measures that apply to the conversion of agricultural lands within the project area are as follows.

[16] Willdan Associates. 1994. *Draft Environmental Impact Report for the Southport Framework Plan, Prepared for the City of West Sacramento*. SCH #91063032. March.

- **Measure 4.3-1:** Depending on the type of pesticide, category of pesticide and type of application, the developer shall provide, for each project proposal, an agricultural buffer in compliance with the Yolo County Agricultural Commission Standards. The buffer could be used for open space or other uses related to agriculture. This buffer may also be accomplished through a phasing plan that limits development within the appropriate agricultural operations. The developer may also purchase temporary agricultural easements on adjacent sites. Once adjacent properties develop to urban uses, the buffer is no longer required.

- **Measure 4.3-2:** In conjunction with recordation of the final subdivision map, the Project Applicant shall record an agricultural deed notice so that the property owner will be aware of agricultural uses on adjoining lands when purchasing property within the project. The language for the notice shall be reviewed and approved by the Community Development Department prior to recordation.

City of West Sacramento Municipal Code. Title 8, Health and Safety of the City's Municipal Code contains Chapter 8.28, Agriculture–Right to Farm.

- **Chapter 8.28, Agriculture—Right to Farm** includes the provision that if land within 1,000 feet of the exterior boundary of agricultural is subdivided, sold, transferred, or leased with an option to purchase, the buyer must sign a disclosure statement regarding the presence of adjacent agricultural operations; the statement is then recorded with the County Recorder's Office.

4.2.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the proposed project would have a significant adverse impact with respect to agriculture and forestry resources if it would:

Threshold 4.2.1: Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use;

Threshold 4.2.2: Conflict with existing zoning for agricultural use, or a Williamson Act contract;

Threshold 4.2.3: Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g));

Threshold 4.2.4: Result in the loss of forest land or conversion of forest land to non-forest use; or

Threshold 4.2.5: Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

4.2.6 Project Impacts

Potential impacts to agriculture and forestry resources are discussed below.

Threshold 4.2.1: Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Less Than Significant Impact. Within the approximately 60-acre project site, 50.18 acres are classified as Farmland of Local Importance, 2.24 acres are classified as Farmland of Local Potential, and the remaining acreage is designated as Urban and Built-Up Land. Farmland of Local Importance refers to land that is important to the local economy as defined by each county's local advisory committee and adopted by its Board of Supervisors. Farmland of Local Importance is either currently producing or has the capability of production; but does not meet the criteria of Prime, Statewide, or Unique Farmland. According to Yolo County, Farmland of Local Importance is cultivated farmland having soils which meet the criteria for Prime or Statewide, except that the land is not presently irrigated, and other non-irrigated farmland. Farmland of Local Potential, which includes Prime or Statewide soils which are presently not irrigated or cultivated.[17] Urban and Built-Up Land is defined as land occupied by structures at a density of at least one unit per 1.5 acres, or approximately 6 units per 10-acre parcel.

In addition, the project site lies within an area that has been planned for urbanization under the City of West Sacramento's long-range planning documents, including the 1995 Southport Framework Plan (amended in 1998) and the General Plan. The Southport Framework Plan was specifically developed to guide the transition of Southport from agricultural uses to more urban residential centers, identifying Rural Estate areas as transitional zones to buffer remaining agricultural lands. Therefore, the proposed change in use is consistent with the City's longstanding planning goals. The City's General Plan also acknowledges that the urbanization of certain agricultural lands, including those currently being farmed, was anticipated.

Given that the project does not propose to convert any farmland of statewide or regional significance, such as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland, and because the conversion of this site has already been anticipated and planned, impacts related to the loss of agricultural land would be **less than significant**. No mitigation is required.

Threshold 4.2.2: Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Less Than Significant Impact. As stated above under Threshold 4.2.1, the project site is currently designated RE in both the City's General Plan and the Southport Framework Plan and is also zoned as RE, which is fundamentally designated as a residential zone. The project site is currently undeveloped, fully graded, and unoccupied. However, the project site is seasonally farmed for hay by

[17] California Department of Conservation. 2018. *Important Farmland Categories. Farmland of Local Importanc*e. Website: https://www.conservation.ca.gov/dlrp/fmmp/Documents/Farmland_of_Local_Importance_2018.pdf (accessed February 2026).

a volunteer farmer and maintained by the property owner, who mows and tills the land as needed.[18] In addition, there are no active Williamson Act contracts within the City, [19] and the project site is not subject to any Williamson Act contracts.

As part of the proposed project, amendments to the City's General Plan and Southport Framework Plan to change the land use designations from RE to Low Density Residential (LR) would be required, along with a Zoning Map/Code amendment to rezone the site from RE to Residential One Family (R-1-A). As described in Chapter 17.08, Residential Zones, of the City's Zoning Code, the RE zoning district is intended to provide for residential development on large lots and to provide a transition between agricultural lands and residential-designated lands. The RE zoning district also allows a range of residential and non-residential uses, including detached single-unit dwellings, accessory dwelling units, parks and recreation facilities, public and quasi-public uses, and limited agricultural uses. Although crop production is identified as a permitted use in the RE zoning district, along with other urban agricultural activities such as aquaculture, community gardens, and private gardens, the purpose of the district is to provide for large-lot residential development and to serve as a transition between agricultural and residential lands.

Accordingly, the proposed Zoning Map/Code Amendment from RE to R-1-A would not convert land primarily zoned for agricultural production or land under an active Williamson Act contract to an urban use. Although the RE zoning designation permits crop production and other urban agricultural activities, these uses are ancillary to the residential designation. Therefore, the proposed project would have a **less than significant** impact on agricultural zoning and would not conflict with a Williamson Act contract; no mitigation is required.

Threshold 4.2.3: Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No Impact. As discussed in Sections 4.2.3.2 and 4.2.3.3, West Sacramento does not have a land use designation for forests and forestry resources. There are no designated forestry resources, timberland, or timberland zoned Timberland Production within the City, including the project site. Therefore, the proposed project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland. Accordingly, **no impact** to forest land or timberland would occur, and no mitigation is required.

Threshold 4.2.4: Would the project result in the loss of forest land or conversion of forest land to non-forest use?

***No Impact*.** Please refer to Threshold 4.2.3 and Sections 4.2.3.2 and 4.2.3.3. West Sacramento does not have a land use designation for forests and forestry resources. Thus, the proposed project would

[18] Project Applicant. 2025. BI-weekly Meeting. Personal communication with LSA. March 26.

[19] California Department of Conservation. 2022. *Williamson Act Enrollment Finder. 2022.* Website: https://maps.conservation.ca.gov/dlrp/WilliamsonAct/ (accessed February 2026).

not result in the loss of forest land or conversion of forest land to non-forest uses. Therefore, **no impact** would occur, and no mitigation is required**.**

Threshold 4.2.5: Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-*agricultural use or conversion of forest land to non-forest use?*

Less Than Significant. As discussed under Thresholds 4.2.1 and 4.2.2, implementation of the proposed project would result in the conversion of land classified by the California DOC FMMP as Farmland of Local Potential and Farmland of Local Importance. However, the project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Conversion of these locally classified farmland categories has been anticipated under the City's General Plan and the Southport Framework Plan. Although the project site is seasonally farmed for hay by a volunteer farmer and maintained by the property owner through periodic mowing and tilling, the RE zoning district permits crop production and urban agricultural uses by right. However, such uses are ancillary to the residential designation, and the RE district is fundamentally a residential zone.

As discussed under Thresholds 4.2.3 and 4.2.4, no forest land or timberland exists within the City of West Sacramento, including the project site. The proposed project would not conflict with existing zoning for, or result in the rezoning of, forest land or timberland and would not result in the conversion of forest land to non-forest use. Therefore, the proposed project would result in a less than significant impact related to the conversion of farmland or forest land, and no mitigation is required.

4.2.7 Cumulative Impacts

Less Than Significant Impact. As defined in Section 15355(b) of the *State CEQA Guidelines*, cumulative impacts refer to the incremental impacts of the project added to other closely related past, present, and reasonably foreseeable probable future projects. The cumulative study area for agricultural and forestry resources is described in Chapter 4.0; the cumulative project list is provided in Chapter 4.0, **Table 4.A**, and a map of the cumulative project locations is provided in Chapter 4.0, **Figure 4-1**.

Although the City of West Sacramento contains some lands classified as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland, much of the farmland in the Southport area has already been planned for urbanization and designated for low-density residential or other non-agricultural uses. As development within West Sacramento continues, these lands would be incrementally removed from agricultural production.

As stated above under Threshold 4.2.1, the proposed project would result in the permanent conversion of approximately 52.42 acres of land classified by the FMMP as Farmland of Local Importance (approximately 50.18 acres) and Farmland of Local Potential (approximately 2.24 acres) within the approximately 60-acre project site. The site is not classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and is not under Williamson Act contract. While the project site was historically used for farming and currently is cultivated on a seasonal basis by a volunteer farmer, the project site lacks the infrastructure and regional connectivity typically

necessary to support long-term agricultural operations. Furthermore, the City's General Plan and the Southport Framework Plan have identified the Southport area, including the project site, for future urbanization. The project site is currently designated and zoned as RE, which allows for limited agricultural uses but is fundamentally a residential land use designation. The proposed General Plan Amendment (GPA) and rezoning would change the site to the LR use designation and R-1-A zoning, consistent with the planned urban development of the Southport area. Although the R-1-A zoning district permits several urban agricultural uses by right such as aquaculture, community gardens, market gardens of less than one acre, and private gardens, the R-1-A zoning district is fundamentally a residential zoning designation and does not allow more intensive agricultural uses, including crop production or animal husbandry.

As stated under Threshold 4.2.2, West Sacramento, including the project site, is not under the Williamson Act contract. None of the cumulative projects identified in the cumulative scenario would affect land subject to a Williamson Act contract. Therefore, the project would not contribute to a cumulative loss of agricultural land under contract, and no cumulative impact would occur.

Additionally, as discussed under Thresholds 4.2.3, 4.2.4, and 4.2.5, no forest land or timberland exists within the City of West Sacramento, including the project site. The proposed project would not conflict with existing zoning for, or result in the rezoning of, forest land or timberland and would not result in the conversion of forest land to non-forest use. No other cumulative projects would result in the loss or conversion of forest land or timberland. Therefore, the project would not contribute to a cumulative impact related to forest or timberland resources.

While the conversion of farmland is part of a broader cumulative trend within the West Sacramento and West Sacramento region, the land within the project site is not characterized as farmland of statewide or regional importance. Furthermore, because the conversion of this site has already been anticipated under adopted long-range planning documents, the project's incremental contribution to the cumulative loss of agricultural land is consistent with City's planning goals and is not considered cumulatively considerable.

Although development in West Sacramento, including the proposed project, would result in the gradual conversion of certain agricultural lands to urban uses, this trend is consistent with the City's General Plan and land use vision. The project site does not contain farmland of statewide or regional importance, is not under Williamson Act contract, and does not contain forest land or timberland. Its urbanization has already been planned and anticipated. Therefore, the project's contribution to cumulative agricultural and forestry impacts would not be cumulatively considerable. The cumulative impact would be **less than significant**. No mitigation is required.

4.2.8 Level of Significance Prior to Mitigation

The proposed project would result in less than significant impacts related to agriculture and forestry resources.

4.2.9 Regulatory Compliance Measures and Mitigation Measures

4.2.9.1 Regulatory Compliance Measures

There are no regulatory compliance measures applicable to the proposed project pertaining to agriculture and forestry resources.

4.2.9.2 Mitigation Measures

The proposed project would not result in significant impacts related to agriculture and forestry resources, and no mitigation is required.

4.2.10 Level of Significance after Mitigation

The proposed project would result in no impacts related to agriculture and forestry resources.

4.3 AIR QUALITY

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for the Brar Farms Residential Development Project (proposed project) to impact air quality in the City of West Sacramento (City). This section is based in part on the *Air Quality, Health Risk, Greenhouse Gas, and Energy Technical Memorandum* (Air Quality/GHG/Energy Analysis) prepared for the proposed project and included in this Draft EIR as **Appendix B**.

4.3.1 Scoping Process

Several comments received during the scoping period addressed air quality. These comments raised concerns related to the proposed project's effect on local air quality, the exceedance of air quality thresholds during construction, and the cumulative air quality impacts associated with the proposed project and all pending and approved residential developments in West Sacramento.

4.3.2 Methodology

The Air Quality/GHG/Energy Analysis prepared for this Draft EIR used the California Emissions Estimator Model (CalEEMod), Version 2022.1, to quantify criteria pollutant emissions for both construction and operation of the proposed project. CalEEMod provides a platform to calculate both construction emissions and operational emissions from a project. It calculates both the daily maximum and annual average for criteria pollutants as well as total or annual greenhouse gas (GHG) emissions. The model also provides default values for water and energy use. Specifically, the model performs the following calculations:

- Short-term construction emissions associated with site preparation, grading, building, architectural coating (painting), and paving from off-road construction equipment; on-road mobile equipment associated with workers, vendors, delivery, and hauling; fugitive dust associated with grading, demolition, truck loading, and roads; and volatile emissions of volatile organic compounds (VOCs) from architectural coating and paving.

- Operational emissions, such as on-road mobile vehicle traffic generated by the land uses, fugitive dust associated with roads, volatile emissions of reactive organic gases (ROGs) from architectural coatings, off-road emissions from landscaping equipment, volatile emissions of ROGs from consumer products and cleaning supplies, natural gas usage in the buildings, electricity usage in the buildings, water usage by the land uses, and solid waste disposal by the land uses.

CalEEMod contains default values and existing regulation methodologies to use in each air quality district. Appropriate statewide default values can be utilized if regional default values are not defined. Yolo County, including the project site, is within the Yolo-Solano Air Quality Management District (YSAQMD). Consistent with YSAQMD requirements, the air quality analysis used project-specific inputs and relevant model default factors for the YSAQMD to produce the emissions inventory.

The *Health Risk Assessment* (HRA) used a dispersion model to translate an emission rate from the source location to a concentration at the receptor location of interest (i.e., a nearby residence and worksites). Dispersion modeling varies from a simpler, more conservative screening-level analysis to

a more complex and refined detailed analysis. This refined assessment was conducted using the California Air Resources Board (CARB) exposure methodology with the air dispersion modeling performed using the United States Environmental Protection Agency (USEPA) dispersion model AERMOD. The model provides a detailed estimate of exhaust concentrations based on site and source geometry, source emissions strength, distance from the source to the receptor, and meteorological data.

4.3.3 Existing Environmental Setting

The proposed project is in West Sacramento, and is within the jurisdiction of the Sacramento Valley Air Basin (SVAB). The YSAQMD is responsible for air quality regulation within the SVAB region.

4.3.3.1 Air Pollutants and Health Effects

Both State and federal governments have established health-based ambient air quality standards (California Ambient Air Quality Standards [CAAQS] and National Ambient Air Quality Standards [NAAQS], respectively) for six criteria air pollutants:[1] carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), lead (Pb), and suspended particulate matter (PM). In addition, the State has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety. Long-term exposure to elevated levels of criteria pollutants may result in adverse health effects. However, emission thresholds established by an air district are used to manage total regional emissions within an air basin based on the air basin's attainment status for criteria pollutants. These emission thresholds were established for individual projects that would contribute to regional emissions and pollutant concentrations and could adversely affect or delay the projected attainment target year for certain criteria pollutants.

Because of the conservative nature of the thresholds and the basin-wide context of individual project emissions, there is no known direct correlation between a single project and localized air quality-related health effects. One individual project that generates emissions exceeding a threshold does not necessarily result in adverse health effects for residents in the project vicinity. This condition is especially true when the criteria pollutants exceeding thresholds are those with regional effects, such as ozone precursors like nitrogen oxides (NO_X) and VOCs.

Occupants of facilities such as schools, daycare centers, parks and playgrounds, hospitals, and nursing and convalescent homes are considered to be more sensitive than the general public to air pollutants because these population groups have increased susceptibility to respiratory disease. Persons engaged in strenuous outdoor work or exercise also have increased sensitivity to poor air quality. Residential areas are considered more sensitive to air quality conditions, compared to commercial and industrial areas, because people generally spend longer periods of time at their residences, with greater associated exposure to ambient air quality conditions. Recreational uses are

[1] Criteria pollutants are defined as those pollutants for which the federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations in order to protect public health.

also considered sensitive compared to commercial and industrial uses due to greater exposure to ambient air quality conditions associated with exercise.

Ozone. Rather than being directly emitted, ozone (or smog) is formed by photochemical reactions between NO_X and VOCs. Ozone is a pungent, colorless gas. Elevated ozone concentrations result in reduced lung function, particularly during vigorous physical activity. This health problem is particularly acute in sensitive receptors such as the sick, the elderly, and young children. Ozone levels peak during the summer and early fall months.

Carbon Monoxide. CO is formed by the incomplete combustion of fossil fuels, almost entirely from automobiles. It is a colorless, odorless gas that can cause dizziness, fatigue, and impairments to central nervous system functions. CO passes through the lungs into the bloodstream, where it interferes with the transfer of oxygen to body tissues.

Particulate Matter. PM is the term used for a mixture of solid particles and liquid droplets found in the air. Coarse particles are those that are 10 microns or less in diameter (PM_{10}). Fine, suspended particulate matter with an aerodynamic diameter of 2.5 microns or less ($PM_{2.5}$), is not readily filtered out by the lungs. Nitrates, sulfates, dust, and combustion particulates are major components of PM_{10} and $PM_{2.5}$. These small particles can be directly emitted into the atmosphere as byproducts of fuel combustion, through abrasion (e.g., tire or brake lining wear), or through fugitive dust (e.g., wind or mechanical erosion of soil). They can also be formed in the atmosphere through chemical reactions. Particulates may transport carcinogens and other toxic compounds that adhere to the particle surfaces and can enter the human body through the lungs.

Nitrogen Dioxide. NO_2 is a reddish-brown gas that is a byproduct of combustion processes. Automobiles and industrial operations are the main sources of NO_2. Aside from its contribution to ozone formation, NO_2 also contributes to other pollution problems, including a high concentration of fine particulate matter, poor visibility, and acid deposition. NO_2 may be visible as a coloring component on high pollution days, especially in conjunction with high ozone levels. NO_2 decreases lung function and may reduce resistance to infection.

Sulfur Dioxide. SO_2 is a colorless, irritating gas formed primarily from incomplete combustion of fuels containing sulfur. Industrial facilities also contribute to gaseous SO_2 levels in the region. SO_2 irritates the respiratory tract, can injure lung tissue when combined with fine particulate matter, and reduces visibility and the level of sunlight.

Lead. Leaded gasoline (phased out in the United States beginning in 1973), paint (on older houses and cars), smelters (metal refineries), and the manufacture of lead storage batteries have been the primary sources of lead released into the atmosphere. Lead has multiple adverse neurotoxic health effects, and children are at special risk. Some lead-containing chemicals cause cancer in animals. Lead levels in the air have decreased substantially since leaded gasoline was eliminated. Ambient lead concentrations are only monitored on an as-warranted, site-specific basis in California. On October 15, 2008, the USEPA strengthened the NAAQS for lead by lowering it from 1.5 to 0.15 micrograms per cubic meter ($\mu g/m^3$). The USEPA revised the monitoring requirements for lead in December 2010. These requirements focus on airports and large urban areas, resulting in an increase in 76 monitors nationally.

Volatile Organic Compounds. VOCs (also known as ROGs and reactive organic compounds [ROCs]) are formed from the combustion of fuels and the evaporation of organic solvents. VOCs are not defined as criteria pollutants; however, because VOCs accumulate in the atmosphere more quickly during the winter, when sunlight is limited and photochemical reactions are slower, they are a prime component of the photochemical smog reaction. There are no attainment designations for VOCs.

Toxic Air Contaminants. In addition to the criteria pollutants discussed above, toxic air contaminants (TACs) are another group of pollutants of concern. TACs are injurious in small quantities and are regulated by the USEPA and the CARB. Some examples of TACs include benzene, butadiene, formaldehyde, and hydrogen sulfide. The identification, regulation, and monitoring of TACs is relatively recent compared to that for criteria pollutants.

TACs do not have ambient air quality standards (AAQS), but are regulated by the USEPA, the CARB, and the YSAQMD. In 1998, the CARB identified particulate matter from diesel-fueled engines as a TAC. The CARB has completed a risk management process that identified potential cancer risks for a range of activities using diesel-fueled engines.[2] High-volume freeways, stationary diesel engines, and facilities attracting heavy and constant diesel vehicle traffic (e.g., distribution centers and truck stops) were identified as posing the highest risk to adjacent receptors. Other facilities associated with increased risk include warehouse distribution centers, large retail or industrial facilities, high-volume transit centers, and schools with a high volume of bus traffic. Health risks from TACs are a function of both concentration and duration of exposure.

Unlike TACs emitted from industrial and other stationary sources noted above, most diesel particulate matter (DPM) is emitted from mobile sources—primarily "off-road" sources such as construction and mining equipment, agricultural equipment, and truck-mounted refrigeration units, as well as "on-road" sources such as trucks and buses traveling on freeways and local roadways.

Although not specifically monitored, recent studies indicate that exposure to DPM may contribute significantly to a cancer risk (a risk of approximately 500 to 700 in 1,000,000) that is greater than all other measured TACs combined.[3] The technology for reducing DPM emissions from heavy-duty trucks is well established, and both State and federal agencies are moving aggressively to regulate engines and emission control systems to reduce and remediate diesel emissions. The CARB anticipated that by 2020, average statewide DPM concentrations will decrease by 85 percent from levels in 2000 with full implementation of the CARB's Diesel Risk Reduction Plan,[4] meaning that the statewide health risk from DPM is expected to decrease from 540 cancer cases in 1,000,000 to 21.5

[2] California Air Resources Board (CARB). 2000. Stationary Source Division and Mobile Source Control Division. *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles.* October.

[3] *Ibid*.

[4] California Air Resources Board (CARB). 2000. Stationary Source Division and Mobile Source Control Division. *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles.* October.

cancer cases in 1,000,000. The CARB 2000 Diesel Risk Reduction Plan is still the most recent version and has not been updated.

Table 4.3.A: Sources and Health Effects of Air Pollutants, summarizes the sources and health effects of air pollutants discussed in this section.

Table 4.3.A: Sources and Health Effects of Air Pollutants

Pollutants	Sources	Primary Effects
Carbon Monoxide (CO)	● Incomplete combustion of fuels and other carbon-containing substances, such as motor exhaust ● Natural events, such as decomposition of organic matter	● Reduced tolerance for exercise ● Impairment of mental function ● Impairment of fetal development ● Death at high levels of exposure ● Aggravation of some heart diseases (angina)
Nitrogen Dioxide (NO_2)	● Motor vehicle exhaust ● High temperature stationary combustion ● Atmospheric reactions	● Aggravation of respiratory illness ● Reduced visibility ● Reduced plant growth ● Formation of acid rain
Ozone (O_3)	● Atmospheric reaction of organic gases with nitrogen oxides in sunlight	● Aggravation of respiratory and cardiovascular diseases ● Irritation of eyes ● Impairment of cardiopulmonary function ● Plant leaf injury
Lead (Pb)	● Contaminated soil	● Impairment of blood functions and nerve construction ● Behavioral and hearing problems in children
Suspended Particulate Matter ($PM_{2.5}$ and PM_{10})	● Stationary combustion of solid fuels ● Construction activities ● Industrial processes ● Atmospheric chemical reactions	● Reduced lung function ● Aggravation of the effects of gaseous pollutants ● Aggravation of respiratory and cardiorespiratory diseases ● Increased cough and chest discomfort ● Soiling ● Reduced visibility
Sulfur Dioxide (SO_2)	● Combustion of sulfur-containing fossil fuels ● Smelting of sulfur-bearing metal ores Industrial processes	● Aggravation of respiratory diseases (asthma, emphysema) ● Reduced lung function ● Irritation of eyes ● Reduced visibility ● Plant injury ● Deterioration of metals, textiles, leather, finishes, coatings, etc.

Source: California Air Resources Board (2015).

4.3.3.1 National and State Ambient Air Quality Standards

Both State and federal governments have established health-based ambient air quality standards for criteria air pollutants. Criteria pollutants are defined as those pollutants for which the federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations in order to protect public health.

Both the USEPA and the CARB have established ambient air quality standards for the following common pollutants: CO, O_3, NO_2, SO_2, Pb, and suspended particulate matter. In addition, the State has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin

of safety. These ambient air quality standards are levels of contaminants that avoid specific adverse health effects associated with each pollutant.

Federal standards include both primary and secondary standards. Primary standards establish limits to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against decreased visibility, and damage to animals, crops, vegetation, and buildings.[5] State and federal standards for the criteria air pollutants are listed below in **Table 4.3.B: Federal and State Ambient Air Quality Standards.**

4.3.3.2 Existing Climate and Air Quality

The following provides a discussion of the climate, regional, and local air quality in West Sacramento.

Climate and Meteorology. Air quality is a function of both local climate and local sources of air pollution. The amount of a given pollutant in the atmosphere is determined by the amount of the pollutant released and the atmosphere's ability to transport and dilute the pollutant. The major determinants of transport and dilution are wind, atmospheric stability, terrain, and for photochemical pollutants, sunshine.

The project site is located within the SVAB and is under the jurisdiction of the YSAQMD. A region's topographic features have a direct correlation with air pollution flow and therefore are used to determine the boundary of air basins. The SVAB is bounded on the north by the Cascade Range, on the south by the San Joaquin Valley Air Basin, on the east by the Sierra Nevada, and on the west by the Coast Ranges. The SVAB contains all of Tehama, Glenn, Butte, Colusa, Yolo, Sutter, Yuba, Sacramento, and Shasta counties, as well as portions of Solano and Placer counties.

The SVAB has a Mediterranean climate characterized by hot, dry summers and cool, rainy winters. During winter, the north Pacific storm track intermittently dominates Sacramento Valley weather, and fair weather alternates with periods of extensive clouds and precipitation. Periods of dense and persistent low-level fog, which is most prevalent between storms, are also characteristic of winter weather in the valley. The frequency and persistence of heavy fog in the valley diminish with the approach of spring. The average yearly temperature range for the Sacramento Valley is 20 degrees Fahrenheit (°F) to 115°F, with summer high temperatures often exceeding 90°F and winter temperatures occasionally dropping below freezing.

[5] United States Environmental Protection Agency (USEPA). 2017. Criteria Air Pollutants. October. Website: www.epa.gov/criteria-air-pollutants (accessed May 2026).

Table 4.3 B: Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[1]		Federal Standards[2]		
		Concentration[3]	Method[4]	Primary[3,5]	Secondary[3,6]	Method[7]
Ozone (O_3)[8]	1-Hour	0.09 ppm (180 µg/m³)	Ultraviolet Photometry	–	Same as Primary Standard	Ultraviolet Photometry
	8-Hour	0.07 ppm (137 µg/m³)		0.070 ppm (137 µg/m³)		
Respirable Particulate Matter (PM_{10})[9]	24-Hour	50 µg/m³	Gravimetric or Beta Attenuation	150 µg/m³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m³		–		
Fine Particulate Matter ($PM_{2.5}$)[9]	24-Hour	-		35 µg/m³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m³	Gravimetric or Beta Attenuation	9.0 µg/m³ [15]		
Carbon Monoxide (CO)	8-Hour	9.0 ppm (10 mg/m³)	Non-Dispersive Infrared Photometry (NDIR)	9 ppm (10 mg/m³)	–	Non-Dispersive Infrared Photometry (NDIR)
	1-Hour	20 ppm (23 mg/m³)		35 ppm (40 mg/m³)		
	8-Hour (Lake Tahoe)	6 ppm (7 mg/m³)		–	–	
Nitrogen Dioxide (NO_2)[10]	Annual Arithmetic Mean	0.03 ppm (57 µg/m³)	Gas Phase Chemi-luminescence	53 ppb (100 µg/m³)	Same as Primary Standard	Gas Phase Chemi-luminescence
	1-Hour	0.18 ppm (339 µg/m³)		100 ppb (188 µg/m³)	-	
Lead (Pb)[12,13]	30-Day Average	1.5 µg/m³	Atomic Absorption	–	–	High-Volume Sampler and Atomic Absorption
	Calendar Quarter	–		1.5 µg/m³ (for certain areas)[12]	Same as Primary Standard	
	Rolling 3-Month Average[9]	–		0.15 µg/m³		
Sulfur Dioxide (SO_2)[11]	24-Hour	0.04 ppm (105 µg/m³)	Ultraviolet Fluorescence	0.14 ppm (for certain areas)	–	Ultraviolet Fluorescence; Spectro-photometry (Pararosaniline Method)
	3-Hour	–		–	0.5 ppm (1300 µg/m³)	
	1-Hour	0.25 ppm (655 µg/m³)		75 ppb (196 µg/m³)[11]	–	
	Annual Arithmetic Mean	–		0.030 ppm (for certain areas)[11]	–	
Visibility-Reducing Particles[12]	8-Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape.	No Federal Standards		
Sulfates	24-Hour	25 µg/m³	Ion Chromatography			
Hydrogen Sulfide	1-Hour	0.03 ppm (42 µg/m³)	Ultraviolet Fluorescence			
Vinyl Chloride[10]	24-Hour	0.01 ppm (26 µg/m³)	Gas Chromatography			

Source: California Air Resources Board (2016).

Table notes are provided on the following page.

[1] California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1- and 24-hour), nitrogen dioxide, and particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California Ambient Air Quality Standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

[2] National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over 3 years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m^3 is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over 3 years, are equal to or less than the standard. Contact USEPA for further clarification and current national policies.

[3] Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[4] Any equivalent measurement method which can be shown to the satisfaction of the CARB to give equivalent results at or near the level of the air quality standard may be used.

[5] National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

[6] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[7] Reference method as described by the USEPA. An “equivalent method” of measurement may be used but must have a “consistent relationship to the reference method” and must be approved by the USEPA.

[8] On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

[9] On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 µg/m^3 to 12.0 µg/m^3. The existing national 24- hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 µg/m^3, as was the annual secondary standard of 15 µg/m^3. The existing 24-hour PM_{10} standards (primary and secondary) of 150 µg/m^3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

[10] To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

[11] On June 2, 2010, a new 1-hour SO_2 standard was established, and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.
Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

[12] The CARB has identified lead and vinyl chloride as ‘toxic air contaminants’ with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[13] The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 µg/m^3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

[14] In 1989, the CARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are “extinction of 0.23 per kilometer” and “extinction of 0.07 per kilometer” for the statewide and Lake Tahoe Air Basin standards, respectively.

[15] On February 7, 2024, the federal annual PM2.5 standard was revised from 12.0 µg/m3 to 9.0 µg/m3.

°C = degrees Celsius
µg/m^3 = micrograms per cubic meter
CARB = California Air Resources Board
mg/m^3 = milligrams per cubic meter
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
ppb = parts per billion
ppm = parts per million
USEPA = United States Environmental Protection Agency

In general, the prevailing winds are moderate in strength and vary from moist clean breezes from the south to dry land flows from the north. The mountains surrounding the SVAB create a barrier to airflow that can trap air pollutants under certain meteorological conditions. The highest frequency of air stagnation occurs in the autumn and early winter when large high-pressure cells collect over the Sacramento Valley. The lack of surface wind during these periods and the reduced vertical flow caused by less surface heating reduce the influx of outside air and allow air pollutants to become concentrated in a stable volume of air. The surface concentrations of pollutants are highest when these conditions are combined with temperature inversions (warm air over cool air), which trap pollutants near the ground.

The ozone season (May through October) in the Sacramento Valley is characterized by stagnant morning air or light winds, with the Delta breeze arriving in the afternoon from the southwest. Usually, the evening breeze transports the airborne pollutants northward out of the Sacramento Valley. During about half of the days from July to September, however, a phenomenon called the Schultz eddy prevents this from occurring. Instead of allowing the prevailing wind patterns to move north carrying the pollutants out, the Schultz eddy causes the wind pattern to circle back to the south. Essentially, this phenomenon causes the air pollutants to be blown south toward the Sacramento Valley and Yolo County. This phenomenon has the effect of exacerbating the pollution levels in the area and increases the likelihood of violating federal or state standards. The eddy normally dissipates around noon when the Delta Breeze arrives.

Attainment Status. The CARB is required to designate areas of the State as attainment, nonattainment, or unclassified for all State standards. An *attainment* designation for an area signifies that pollutant concentrations did not violate the standard for that pollutant in that area. A *nonattainment* designation indicates that a pollutant concentration violated the standard at least once, excluding those occasions when a violation was caused by an exceptional event, as defined in the criteria. An *unclassified* designation signifies that data do not support either an attainment or nonattainment status. The California Clean Air Act (CCAA) divides districts into moderate, serious, and severe air pollution categories, with increasingly stringent control requirements mandated for each category.

The USEPA designates areas for O_3, CO, and NO_2 as one of the following: they do not meet the primary standards, they cannot be classified, or they are better than national standards. For SO_2, areas are designated as do not meet the primary standards, do not meet the secondary standards, cannot be classified, or better than national standards. In February 2024, the USEPA issued a final revised standard for $PM_{2.5}$ to lower the primary standard from 12 µg/m^3 to 9 µg/m^3. The USEPA will issue final area designations in February 2026.

Table 4.3.C: Sacramento Valley Air Basin Air Quality Attainment Status provides a summary of the attainment status for the SVAB with respect to the NAAQS and the CAAQS.

Table 4.3.C: Sacramento Valley Air Basin Air Quality Attainment Status

Pollutant	Federal	State
Ozone (1-hour)	Nonattainment	Nonattainment
Ozone (8-hour)	Nonattainment	Nonattainment
PM_{10}	Nonattainment	Unclassified
$PM_{2.5}$	Unclassified	Attainment
Carbon Monoxide	Attainment	Attainment
Nitrogen Dioxide	Attainment	Attainment
Lead	Attainment	Attainment
Sulfur Dioxide	Attainment	Attainment
Sulfates	No Federal Standard	Attainment
Hydrogen Sulfide	No Federal Standard	Unclassified

Source: California Air Resources Board and USEPA (2023).
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size

Air Quality Monitoring Results. Air quality monitoring stations are located throughout the nation and maintained by the local air districts and State air quality regulating agencies. Data collected at permanent monitoring stations are used by the USEPA to identify regions as "attainment" or "nonattainment" depending on whether the regions meet the requirements stated in the applicable NAAQS. Nonattainment areas are imposed with additional restrictions as required by the USEPA. In addition, different classifications of attainment, such as marginal, moderate, serious, severe, and extreme, are used to classify each air basin in the State on a pollutant-by-pollutant basis. The classifications are used as a foundation to create air quality management strategies to improve air quality and comply with the NAAQS.

The YSAQMD, together with the CARB, maintains ambient air quality monitoring stations in the SVAB. The air quality monitoring stations closest to the project area are UC Davis Campbell Road in Yolo County, 100 Bercut Drive and 1309 T Stret in Sacramento, and Del Paso 2701 Avalon Drive in Sacramento County, California.

Pollutant monitoring results for 2022 to 2024 at the nearby ambient air quality monitoring stations, shown in **Table 4.3.D: Ambient Air Quality at Nearby Monitoring Stations** indicates that air quality in the area has generally been good. As indicated in the monitoring results, the State PM_{10} standard was exceeded six times in 2022, two times in 2023, and no times in 2024. In addition, the federal PM_{10} standard was not exceeded during the 3-year period. The federal $PM_{2.5}$ standard had one exceedance in 2023, and 2024 only. The State 1-hour ozone standard was also not exceeded in the 3-year period. The State 8-hour ozone standard had only one exceedance in 2022. Similarly, the federal 8-hour ozone standard was exceeded one time in 2022 only. The CO, NO_2, and SO_2 standards were not exceeded in this area during the 3-year period.

Table 4.3.D: Ambient Air Quality at Nearby Monitoring Stations

Pollutant	Standard	2022	2023	2024
Carbon Monoxide (CO)[1]				
Maximum 1-hour concentration (ppm)		2.0	1.9	1.5
Number of days exceeded:	State: > 20 ppm	ND	ND	ND
	Federal: > 35 ppm	0	0	0
Maximum 8-hour concentration (ppm)		1.6	1.3	1.1
Number of days exceeded:	State: > 9 ppm	0	0	0
	Federal: > 9 ppm	0	0	0
Ozone (O_3)[2]				
Maximum 1-hour concentration (ppm)		0.078	0.080	0.077
Number of days exceeded:	State: > 0.09 ppm	0	0	0
Maximum 8-hour concentration (ppm)		0.071	0.068	0.069
Number of days exceeded:	State: > 0.07 ppm	1	0	0
	Federal: > 0.07 ppm	1	0	0
Coarse Particulates (PM_{10})[3]				
Maximum 24-hour concentration (µg/m^3)		61.3	61.9	49.7
Number of days exceeded:	State: > 50 µg/m^3	6	2	0
	Federal: > 150 µg/m^3	0	0	0
Annual arithmetic average concentration (µg/m^3)		21.0	ND	17.4
Exceeded for the year:	State: > 20 µg/m^3	Yes	ND	No
	Federal: > 50 µg/m^3	No	ND	No
Fine Particulates ($PM_{2.5}$)[3]				
Maximum 24-hour concentration (µg/m^3)		33.1	35.6	35.6
Number of days exceeded:	Federal: > 35 µg/m^3	0	1	1
Annual arithmetic average concentration (µg/m^3)		8.6	7.2	6.9
Exceeded for the year:	State: > 12 µg/m^3	No	No	No
	Federal[1] > 12 µg/m^{3a}	No	No	No
Nitrogen Dioxide (NO_2)[2]				
Maximum 1-hour concentration (ppm)		0.027	0.022	0.025
Number of days exceeded:	State: > 0.250 ppm	0	0	0
Annual arithmetic average concentration (ppm)		ND	0.003	0.003
Exceeded for the year:	Federal: > 0.053 ppm	ND	No	No
Sulfur Dioxide (SO_2)[4]				
Maximum 1-hour concentration (ppm)		0.0028	0.0023	0.0024
Number of days exceeded:	State: > 0.25 ppm	0	0	0
Maximum 24-hour concentration (ppm)		0.0006	0.0011	0.0008
Number of days exceeded:	State: > 0.04 ppm	0	0	0
	Federal: > 0.14 ppm	0	0	0
Annual arithmetic average concentration (ppm)		0.00012	0.00012	0.0006
Exceeded for the year:	Federal: > 0.030 ppm	No	No	No

Sources: CARB (2025) and EPA (2025).

Note: On February 7, 2024, the federal annual $PM_{2.5}$ standard was revised from 12.0 µg/m3 to 9.0 µg/m3. However, since the data presented in Table 4.3.D is through 2022, it uses the 12.0 µg/m^3 standard that was in effect through 2022.

[1] Data was taken from the 100 Bercut Drive Monitoring Station .

[2] Data was taken from the UC Davis Campbell Road Monitoring Station.

[3] Data was taken from the 1309 T Street Monitoring Station.

[4] Data was taken from the Del Paso 2701 Avalon Drive Monitoring Station

µg/m^3 = micrograms per cubic meter
CARB = California Air Resources Board
EPA = United States Environmental Protection Agency
ND = No data. There were insufficient (or no) data to determine the value.
ppm = parts per million

4.3.4 Regulatory Setting

Federal, State, and local regulations and programs related to air quality that are applicable to the proposed project are described below.

4.3.4.1 Federal Regulations

Federal Clean Air Act. The 1970 Federal Clean Air Act (CAA) regulates emissions from stationary and mobile sources in the United States. The CAA authorized the Environmental Protection Agency to establish NAAQS for six pollutants, described as criteria pollutants. These pollutants include CO, Pb, NO_2, O_3, SO_2, $PM_{2.5}$, and PM_{10}. For areas in nonattainment of one or more of the NAAQS, the CAA also established a requirement for the development of State Implementation Plans (SIPs) by the States that demonstrate how they will achieve the NAAQS by specified dates. The Federal Clean Air Act Amendments of 1990 changed deadlines for attaining the NAAQS as well as the remedial actions required for areas that exceed the standards.

4.3.4.2 State Regulations

California Clean Air Act. Enacted in 1988, the CCAA requires all air quality districts in the State to endeavor to achieve and maintain the CAAQS for CO, O_3, SO_2, NO_2, $PM_{2.5}$, PM_{10}, and sulfates, visibility reducing particles, hydrogen sulfide (H_2S), and vinyl chloride by the earliest practical date. The CCAA provides districts with the authority to regulate indirect sources and mandates that air districts focus particular attention on reducing emissions from transportation and area-wide emission sources. Each air district in nonattainment of one or more of the CAAQS is required to adopt a plan to achieve a 5 percent annual reduction, averaged over consecutive 3-year periods, in district-wide emissions of each criteria pollutant (or its precursors) for which the district is in nonattainment. A Clean Air Plan shows how a district would reduce emissions to achieve air quality standards. Generally, the State standards for these pollutants are more stringent than the national standards.

California Air Resources Board. The CARB is the State's "clean air agency." The CARB's goals are to attain and maintain healthy air quality, protect the public from exposure to toxic air contaminants, and oversee compliance with air pollution rules and regulations.

Assembly Bill 2588: Air Toxics "Hot Spots" Information and Assessment Act. Under Assembly Bill (AB) 2588, stationary sources of air pollutants are required to report the types and quantities of certain substances that their facilities routinely release into the air. The goals of the Air Toxics "Hot Spots" Act are to collect emission data, identify facilities having localized impacts, determine health risks, and notify nearby residents of significant risks.

The California Air Resources Board Handbook. CARB has developed an Air Quality and Land Use Handbook[6] (CARB Handbook) (2005), which is intended to serve as a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. According to the CARB Handbook, air pollution studies have shown an association between respiratory and other non-cancer-related health effects and proximity to high

[6] CARB. 2005. *Air Quality and Land Use Handbook: A Community Health Perspective* (CARB Handbook). April.

traffic roadways. Other studies have shown that diesel exhaust and other cancer-causing chemicals emitted from cars and trucks are responsible for much of the overall cancer risk from airborne toxics in California. The CARB Handbook recommends that county and city planning agencies strongly consider proximity to these sources when finding new locations for "sensitive" land uses such as homes, medical facilities, daycare centers, schools, and playgrounds.

Land use designations with air pollution sources of concern include freeways, rail yards, ports, refineries, distribution centers, chrome plating facilities, dry cleaners, and large gasoline service stations. Key recommendations in the CARB Handbook include taking steps to avoid siting new, sensitive land uses:

- Within 500 feet of a freeway, urban roads with 100,000 vehicles/day or rural roads with 50,000 vehicles/day;
- Within 1,000 feet of a major service and maintenance rail yard;
- Immediately downwind of ports (in the most heavily impacted zones) and petroleum refineries;
- Within 300 feet of any dry cleaning operation (for operations with two or more machines, provide 500 feet); and
- Within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater).

The CARB Handbook specifically states that its recommendations are advisory and acknowledges land use agencies have to balance other considerations, including housing and transportation needs, economic development priorities, and other quality of life issues.

The recommendations are generalized and do not consider site-specific meteorology, freeway truck percentages, or other factors that influence risk for a particular project site. The purpose of this guidance is to further examine project sites for actual health risk associated with the location of new sensitive land uses.

4.3.4.3 Regional Regulations

Yolo-Solano Air Quality Management District. The YSAQMD has jurisdiction over air quality matters in Yolo County and the northeast portion of Solano County, which lies within the Sacramento Valley Air Basin (SVAB). The remainder of Solano County is within the San Francisco Bay Area Air Basin and under the jurisdiction of the Bay Area Air Quality Management District. YSAQMD is the agency principally responsible for comprehensive air pollution control in its jurisdiction and is tasked with implementing programs and regulations required by both the federal CAA and the CCAA. The YSAQMD prepares air quality attainment plans to achieve and maintain compliance with the CAAQS and the NAAQS. YSAQMD's regulatory authority includes reducing emissions from stationary sources (both area and point sources), developing rules and regulations, establishing permitting requirements, inspecting emissions sources, and enforcing applicable measures through education, incentive programs, or penalties when necessary.

YSAQMD Handbook for Assessing and Mitigating Air Quality Impacts. The YSAQMD has prepared a Handbook for Assessing and Mitigating Air Quality Impacts (handbook) as an advisory document to provide Lead Agencies, consultants, and project applicants with procedures for addressing air quality impacts in environmental documents. The handbook contains preliminary actions Lead Agencies can take to reduce air quality impacts; criteria and thresholds; project screening methods; and mitigation measures.

Sacramento Area Council of Governments. As the designated Metropolitan Planning Organization (MPO) for the six-county 22-city Sacramento metropolitan region, the Sacramento Area Council of Governments (SACOG) prepares several plans to address regional growth, including the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). SACOG is mandated by federal and State law to research and draw up plans for transportation, growth management, hazardous waste management, and a regional growth forecast that is the foundation for these plans and regional air quality plans. SACOG prepares several plans to address regional growth, including the Regional Comprehensive Plan and Guide, Regional Housing Needs Assessment, the MTP/SCS, the Regional Transportation Improvement Program, and the annual State of the Region reports to measure progress toward achieving regional planning goals and policies. In 2022, the SACOG Board adopted the 2025 Blueprint growth projections for population, employment, and households in the region. On November 20, 2025, SACOG adopted the MTP/SCS to the final 2025 Blueprint Plan.[7]

4.3.4.4 Local Regulations

City of West Sacramento 2035 General Plan. The following policies and goals are included in the Safety Element of the General Plan and may be applicable to the proposed project:

- **Goal S-5:** To improve air quality in West Sacramento and the Sacramento Region, and protect residents from the potential effects of decreased air quality.
    - **Policy S-5.1:** The City shall support and participate in local and regional air quality planning programs to ensure the earliest practicable attainment and subsequent maintenance of Federal and State ambient air quality standards.
    - **Policy S-5.2:** The City shall promote and implement clean air programs administered by the Yolo-Solano Air Quality Management District to reduce air pollution emissions.
    - **Policy S-5.3:** The City shall use the CEQA process to ensure development projects incorporate feasible mitigation measures to reduce construction and operational air quality emissions, and consult with the Yolo-Solano Air Quality Management District early in the development review process.
    - **Policy S-5.4:** The City shall ensure maintenance of adequate separation between sensitive land uses and facilities or operations that may produce toxic or hazardous air pollutants or substantial odors consistent with California Air Resources Board recommendations.

[7] Sacramento Area Council of Governments (SACOG). 2022. *2025 Blueprint.* Website: https://www.sacog.org/planning/2025-blueprint/2025-blueprint-plan (accessed June 2026).

- **Policy S-5.7:** The City shall require developers to reduce particulate emissions from construction (e.g., grading, excavation, and demolition) to the maximum extent feasible and consistent with Yolo-Solano Air Quality Management District guidance.

- **Policy S-5.9:** The City shall maximize the use of current air quality mitigation measures, including offsets, into the construction and design of new development to aid in the reduction of regional air pollution emissions.

4.3.5 Thresholds of Significance

4.3.5.1 CEQA Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the proposed project would have a significant adverse impact with respect to air quality if it would:

Threshold 4.3.1: Conflict with or obstruct implementation of the applicable air quality plan;

Threshold 4.3.2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or state ambient air quality standard;

Threshold 4.3.3: Expose sensitive receptors to substantial pollutant concentrations; or

Threshold 4.3.4: Result in other emissions (such as those leading to odors adversely affecting a substantial number of people).

4.3.6 Project Impacts

Please refer to Section 4.3.9 for a full text description of the regulatory compliance and/or mitigation measures referenced in the analysis below.

Threshold 4.3.1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. An Air Quality Management Plan consistency determination plays an essential role in local agency project review by linking local planning and unique individual projects to the information provided in air quality management plans. A consistency determination fulfills the CEQA goal of fully informing local agency decision-makers of the environmental costs of a project under consideration at a stage early enough to ensure that air quality concerns are addressed. Because air quality management plans are based on development projections from land use designations depicted and described in local General Plans, only new or amended General Plan elements, Specific Plans, and significantly unique projects need to undergo a consistency review.

The applicable air quality plan is the 2017 Sacramento Regional 2008 8-Hour Ozone and Further Reasonable Progress Plan (2017 Ozone Plan). Consistency with the 2017 Ozone Plan can be determined if (1) the proposed project supports the goals of the plan, includes applicable control measures from the plan, and (2) would not disrupt or hinder implementation of any control

measures from the plan. For air quality planning purposes, the 2017 Ozone Plan contains emissions inventories based on existing and foreseeable future land uses within the planning area. If a new project is consistent with the planned land use designation that was considered in the forecasts used to develop an air quality management plan, the project would be considered consistent with the buildout assumptions and, as a result, would not conflict with nor obstruct implementation of the applicable air quality management plan. Generally, the local general plan is used in preparation of regional air quality management plans. In that case, a project's conformance with a local general plan land use designation demonstrates that the project would not conflict with or obstruct implementation of the air quality management plan.

As discussed in Chapter 3.0, Project Description, the proposed project would require a General Plan Amendment to the City's existing General Plan and an amendment to the Southport Framework Plan to change the designations from Rural Estates (RE) to Low-Density Residential (LR). It would also require a Zoning Map/Code amendment to rezone the site from RE to Residential One Family (R-1-A). The proposed project involves the construction of 259 new residential lots and associated improvements on the project site. The City's 2021–2029 Housing Element Update reports 2.8 residents per household in West Sacramento;[8] therefore, the development of 259 residential estates could house approximately 725 residents. This level of growth is also well within the City's projections in the SACOG 2020–2050 Metropolitan Transportation Plan/Sustainable Communities Strategy (2025 Blueprint Plan), which identifies the City's housing is projected to increase by 15,880 units from 2020 to 2050. Therefore, the proposed project would be consistent with the 2025 Blueprint Plan and the population growth assumptions for the region, and the land use assumptions in the 2017 Ozone Plan.

The proposed project would result in short-term construction and long-term operational pollutant emissions. As demonstrated under threshold 4.3.2 in **Table 4.3.E: Short-Term Regional Construction Emissions** and **Table 4.3.F: Unmitigated Project Operational Emissions**, the proposed project would not result in the generation of criteria air pollutants that would exceed YSAQMD thresholds of significance. Thresholds of significance are intended to help identify whether a project is consistent with the applicable air quality management plan. The YSAQMD requires implementation of Rule 2.11 for PM control during construction. These control measures are intended to reduce the amount of PM_{10} emissions during the construction period. Implementation of the fugitive dust control measures outlined in **Regulatory Compliance Measure AIR-1** would ensure that the proposed project complies with YSAQMD's Rule 2.11 (**Regulatory Compliance Measure AIR-1**), the proposed project would not conflict with or obstruct implementation of applicable air quality plans.

Threshold 4.3.2: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact. The SVAB is designated as non-attainment for the O_3 and $PM_{2.5}$ NAAQS and non-attainment for O_3, PM_{10}, and $PM_{2.5}$ CAAQS. The YSAQMD non-attainment status is attributed

[8] City of West Sacramento. 2021. *2021-2029 Housing Element Update,* Table A-6. Website: https://www.cityofwestsacramento.org/home/showpublisheddocument/12221/637619619413930000 (accessed September 2025).

to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in non-attainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, the YSAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. The following analysis assesses the potential construction- and operation-related air quality impacts.

Construction Emissions. During construction, short-term degradation of air quality may occur due to the release of criteria pollutant emissions generated by grading, paving, building, and other activities that involve heavy equipment use. Emissions from construction equipment also include TACs such as diesel exhaust particulate matter.

Construction activities associated with the proposed project would include site preparation, grading, paving, and building activities. Construction-related effects on air quality from the proposed project would be greatest during the site preparation phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site may deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM_{10} emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM_{10} emissions would depend on soil moisture, silt content of soil, wind speed, and the amount of operating equipment. Larger dust particles would settle near the source, while fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. The YSAQMD has implemented Rule 2.11 measures for reducing particulate matter emissions. With the implementation of Rule 2.11, fugitive dust emissions from construction activities would not result in adverse air quality impacts.

In addition to dust-related PM_{10} emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, SO_2, NO_x, ROG, and $PM_{2.5}$ and PM_{10} in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

Construction emissions were estimated for the project using CalEEMod and are summarized in **Table 4.3.E: Short-Term Regional Construction Emissions**.

Table 4.3.E: Short-Term Regional Construction Emissions

Construction Year	Pollutant Emissions					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions (pounds per day)						
2027	1.7	62.9	41.0	0.1	9.3	5.0
2028	40.3	22.0	21.7	<0.1	2.1	1.1
YSAQMD Threshold	N/A	N/A	N/A	N/A	80	N/A
Above Threshold?	**N/A**	**N/A**	**N/A**	**N/A**	**No**	**N/A**
Annual Emissions (tons per year)						
2027	0.2	4.4	3.3	<0.1	0.6	0.3
2028	2.1	1.2	1.1	<0.1	0.1	0.1
YSAQMD Threshold	10.0	10.0	N/A	N/A	N/A	N/A
Significant?	**No**	**No**	**N/A**	**N/A**	**N/A**	**N/A**

Source: Compiled by LSA (May 2026).
CO = carbon monoxide
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
ROG = reactive organic gas
SO_X = sulfur oxides
YSAQMD = Yolo Solano Air Quality Management District

As shown in **Table 4.3.E**, maximum daily PM_{10} emissions from project construction would be 9.3 pounds per day in 2027 and 2.1 pounds per day in 2028, which would be below the significance threshold of 80 pounds per day for PM_{10}. As shown in **Table 4.3.E**, annual emissions from project construction would be 0.2 tons per year of ROG and 4.4 tons per year of NOx in 2027, and 2.1 tons per year of ROG and 1.2 tons per year of NOx in 2028. These emissions would be below the significance threshold of 10 tons per year for both ROG and NOx. In addition to the construction period thresholds of significance, the YSAQMD has recommended measures for dust control during construction. Implementation of **Regulatory Compliance Measure AIR-1** would ensure that the proposed project complies with Rule 2.11.

Construction emissions associated with the proposed project would be less than significant with implementation of **Regulatory Compliance Measure AIR-1**. Therefore, construction of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard.

Operational Air Quality Impacts. Long-term air pollutant emission impacts associated with the proposed project are those related to mobile sources (e.g., vehicle trips), and area sources (e.g., architectural coatings and the use of landscape maintenance equipment). The proposed project would be designed and operated as an all-electric development. Therefore, no on-site combustion of natural gas or other fuel sources would occur, and no operational criteria pollutant emissions associated with energy use would be generated.

Mobile source emissions include ROG and NO_X emissions that contribute to the formation of ozone. Additionally, PM_{10} emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways.

Typically, area source emissions consist of direct sources of air emissions located at the project site, including architectural coatings and the use of landscape maintenance equipment. Area source emissions associated with the project would include emissions from the use of landscaping equipment and the use of consumer products.

Long-term operational emissions associated with the proposed project were calculated using CalEEMod. **Table 4.3.F: Project Operational Emissions** provides the proposed project's estimated operational emissions.

Table 4.3.F: Project Operational Emissions

Emission Type	Pollutant Emissions					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Daily Emissions (pounds per day)						
Mobile Sources	11.0	13.1	110.4	0.3	22.5	5.9
Area Sources	13.3	0.1	14.7	<0.1	<0.1	<0.1
Energy Sources	0.0	0.0	0.0	0.0	0.0	0.0
Total Project Emissions	**24.3**	**13.2**	**125.1**	**0.3**	**22.5**	**5.9**
YSAQMD Threshold	N/A	N/A	N/A	N/A	80	N/A
Above Threshold?	**N/A**	**N/A**	**N/A**	**N/A**	**No**	**N/A**
Annual Emissions (tons per year)						
Mobile Sources	1.8	2.2	17.0	<0.1	4.1	1.1
Area Sources	2.3	<0.1	1.3	<0.1	<0.1	<0.1
Energy Sources	0.0	0.0	0.0	0.0	0.0	0.0
Total Project Emissions	**4.1**	**2.2**	**18.3**	**<0.1**	**4.1**	**1.1**
YSAQMD Threshold	10.0	10.0	N/A	N/A	N/A	N/A
Significant?	**No**	**No**	**N/A**	**N/A**	**N/A**	**N/A**

Source: Compiled by LSA (July 2026).
Note: Some values may not appear to add correctly due to rounding.
CO = carbon monoxide
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
ROG = reactive organic gas
SO_X = sulfur oxides
YSAQMD = Yolo-Solano Air Quality Management District

The results shown above in **Table 4.3.F** indicate that the proposed project would not exceed the significance criteria for daily ROG, NO_X, and PM_{10} emissions. Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State AAQS.

Threshold 4.3.3: Would the project expose sensitive receptors to substantial pollutant concentrations?

***Less Than Significant with Mitigation Incorporated*.** Construction of the project would require the use of diesel-fueled equipment, which could be a source of toxic air contaminants. Additionally, during project operation, residential gasoline vehicles would access the project site. Sensitive receptors are defined as residential uses, schools, daycare centers, nursing homes, and medical centers. Individuals particularly vulnerable to diesel particulate matter are children, whose lung tissue is still developing, and the elderly, who may have serious health problems that can be

aggravated by exposure to diesel particulate matter. The project site is surrounded primarily by agricultural and residential uses. The closest sensitive receptors to the project site include single-family residences immediately south and west at approximately 25 feet as measured from the project boundary to the building façade. Other nearby sensitive receptors include the single-family residences east and north of the project site at approximately 56 feet and 50 feet, respectively. The closest worker receptor is east of the project site along Otis Avenue at approximately 57 feet. The nearest school is north of the project site at approximately 1,728 feet from the project northern boundary to the school's property line.

Health Risk on Nearby Sensitive Receptors. The following sections describe the potential impacts on sensitive receptors from construction and operation of the proposed project, which is based on the results of the Air Quality, Energy, and Greenhouse Gas Impact Analysis provided in **Appendix B** of this Draft EIR. The HRA analysis and results are presented below. Model inputs, detailed construction and operational data, and other details are also included in **Appendix B**.

Construction Health Risk Assessment. A construction HRA, which evaluates construction-period health risk to off-site receptors, was performed for the proposed project. **Table 4.3.G: Health Risks from Project Construction to Off-Site Receptors**, below, identifies the results of the analysis at the maximally exposed individual (MEI), who is a hypothetical individual who, because of realistically assumed proximity, activities, and living habits, would receive the highest exposure of a pollutant. Model snap shots of the sources are included in **Appendix B.**

Table 4.3.G: Health Risks from Project Construction to Off-Site Receptors

Location	Carcinogenic Inhalation Health Risk in 1 Million	Chronic Inhalation Hazard Index	Acute Inhalation Hazard Index
Residential Receptor Risk	11.13	0.011	0.000
Worker Receptor Risk	0.11	0.006	0.000
School Receptor Risk	0.22	<0.001	0.000
YSAQMD Significance Threshold	**10.0 in one million**	**1.0**	**1.0**
Significant?	**Yes**	**No**	**No**

Source: LSA (May 2026).
YSAQMD = Yolo-Solano Air Quality Management District

As shown in **Table 4.3.G,** the maximum cancer risk for the residential MEI would be 11.13 in 1 million, which would exceed the YSAQMD cancer risk threshold of 10 in 1 million. The worker receptor risk would be lower at 0.11 in 1 million and the school receptor risk would be 0.22 in 1 million, which would not exceed the YSAQMD cancer risk thresholds. The total chronic hazard index would be 0.011 for the residential MEI, 0.006 for the worker MEI, and less than 0.001 for the school MEI, which are all below the threshold of 1.0. In addition, the total acute hazard index would be nominal (0), which would also not exceed the threshold of 1.0. Therefore, implementation of **Mitigation Measure AIR-1** would be required to reduce construction cancer risk.

In addition, as shown in **Table 4.3.H: Mitigated Health Risks from Project Construction to Off-Site Receptors**, with the implementation of **Mitigation Measure AIR-1** the maximum cancer risk for the residential MEI would be 9.07 in 1 million, which would not exceed the YSAQMD cancer risk threshold of 10 in 1 million. Therefore, with implementation of **Mitigation Measure AIR-1**, construction of the proposed project would not exceed YSAQMD thresholds and would not expose nearby sensitive receptors to a significant health risk.

Table 4.3.H: Mitigated Health Risks from Project Construction to Off-Site Receptors

Location	Carcinogenic Inhalation Health Risk in 1 Million	Chronic Inhalation Hazard Index	Acute Inhalation Hazard Index
Residential Receptor Risk	9.07	0.009	0.000
Worker Receptor Risk	0.09	0.005	0.000
School Receptor Risk	0.18	<0.001	0.000
YSAQMD Significance Threshold	**10.0 in one million**	**1.0**	**1.0**
Significant?	**No**	**No**	**No**

Source: Compiled by LSA (May 2026).
YSAQMD = Yolo-Solano Air Quality Management District

Operational Health Risk. The proposed project would include the construction of a 259-unit single-family residential development. The California Office of Environmental Health Hazard Assessment's (OEHHA) *Air Toxic Hot Spots Program Risk Assessment Guidelines*[9] has determined that long-term exposure to diesel exhaust particulates poses the highest cancer risk of any TAC it has evaluated. In addition, CARB has also identified DPM emitted by off-road and diesel-fueled engines as a TAC.[10] Accordingly, the TAC of concern would be DPM associated with the use of diesel engines during project construction and operation. For risk assessment procedures, the OEHHA specifies that the surrogate for whole diesel exhaust is DPM. HRA analyses typically use PM_{10} emissions to represent DPM emissions, consistent with OEHHA guidance.

As shown above in **Table 4.3.F**, PM_{10} emissions, which are a surrogate for TAC emissions during operation, would be 22.5 pounds per year, which is below the YSAQMD threshold of 80 pounds per year, indicating that significant mass emissions of PM_{10} would not occur and a significant health risk would also not occur. The project operational emissions of criteria pollutants would be below YSAQMD significance thresholds; thus, they are not likely to have a significant impact on sensitive receptors. Compliance with YSAQMD rules would further limit doses and exposures, reducing potential health risk related to vehicle and equipment emissions to a level that is not significant. Once the proposed project is constructed, the proposed project would not be a source of substantial emissions. Therefore, implementation of the proposed project would not result in new sources of TACs. Therefore, the project would not expose sensitive receptors to substantial levels of TACs.

9 California Office of Environmental Health Hazard Assessment (OEHHA). 2015. *Air Toxic Hot Spots Program – Risk Assessment Guidelines*. February. Website: https://oehha.ca.gov/media/downloads/crnr/2015 guidancemanual.pdf (accessed July 2026).

10 California Air Resources Board (CARB). 2026. *Overview: Diesel Exhaust and Health*. Website: https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health (accessed July 2026).

Long-Term Microscale (CO Hot Spot) Analysis. Vehicular trips associated with the proposed project would contribute to congestion at intersections and along roadway segments in the vicinity of the proposed project site. Localized air quality impacts would occur when emissions from vehicular traffic increase as a result of the proposed project. The primary mobile-source pollutant of local concern is CO, a direct function of vehicle idling time and, thus, of traffic flow conditions. CO transport is extremely limited; under normal meteorological conditions, it disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels, affecting local sensitive receptors (e.g., residents, schoolchildren, the elderly, and hospital patients).

Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes. In areas with high ambient background CO concentrations, modeling is recommended to determine a project's effect on local CO levels.

An assessment of project-related impacts on localized ambient air quality requires that future ambient air quality levels be projected. Ambient CO levels monitored at the 100 Bercut Drive air quality monitoring station, the closest station to the project site monitoring CO, showed a highest recorded 1-hour concentration of 2.0 parts per million (ppm) (the State standard is 20 ppm) and a highest 8-hour concentration of 1.6 ppm (the State standard is 9 ppm) during the past 3 years (**Table 4.3.D)**. The highest CO concentrations would normally occur during peak traffic hours; hence, CO impacts calculated under peak traffic conditions represent a worst-case analysis.

As part of its CEQA Air Quality Guidelines, the YSAQMD provides a screening methodology based on peak hourly traffic volumes to evaluate potential impacts of CO emissions from mobile sources. The proposed project would result in a less than significant impact for local CO if the following criteria are met:

- A traffic study for the project indicates that the peak-hour level of service (LOS) on one or more streets in the project vicinity would be reduced to an unacceptable LOS (typically LOS E or F).

- A traffic study indicates that the project would substantially worsen an already existing peak-hour LOS F on one or more streets (delay would increase by 10 seconds or more when project-generated traffic is included).

Based on the project's *Transportation Study,*[11] the proposed project would result in 178 AM peak hour trips and 244 PM peak hour trips. As described in the *Transportation Study*, implementation of the proposed project would not substantially change the LOS at any given intersection. The study intersections would continue to operate at a LOS C or better, which does not conflict with the City's policy regarding the level of service performance of the circulation system. Therefore, the project would not have an impact on the City's level of service performance policy. Therefore, the proposed project is not anticipated to result in any LOS or operational deficiencies to the surrounding

[11] Linscott, Law & Greenspan, Engineers (LLG). 2025. *Transportation Study for 3425 Marshall Road Residential.* April 2.

circulation system. Therefore, the proposed project would have a less than significant impact on CO hotspots.

Threshold 4.3.4: Would the project result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?

Less Than Significant Impact. The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source, the wind speeds and direction, and the sensitivity of the receiving location each contribute to the intensity of the impact. While offensive odors rarely cause any physical harm, they can be unpleasant and cause distress among the public and generate citizen complaints.

During construction, diesel exhaust from construction equipment would generate some odors. However, construction-related odors would be temporary and would not persist upon construction completion. Once operational, the proposed project would not include any sources of odor emissions; therefore, operation of the proposed project would not generate any odor impacts. The proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Therefore, this impact would be less than significant.

4.3.7 Cumulative Impacts

Less Than Significant Impact. As defined in Section 15355(b) of the *State CEQA Guidelines*, cumulative impacts refer to the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. The cumulative impact area for air quality related to the proposed project is the SVAB. Each project in the SVAB is required to comply with YSAQMD rules and regulations and is subject to independent review.

The SVAB is currently designated as nonattainment for O_3 and $PM_{2.5}$ for federal standards and nonattainment for O_3, PM_{10}, and $PM_{2.5}$ for State standards. The SVAB's nonattainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, the YSAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions.

Therefore, if the proposed project's annual emissions of construction- or operations-related criteria air pollutants exceed any applicable threshold established by the YSAMQD, the proposed project would result in a considerable contribution to a cumulatively significant impact.

As discussed under Threshold 4.3.2, above, construction of the proposed project would generate short-term emissions of PM_{10}, $PM_{2.5}$, NO_X, ROG, CO, and TACs. Maximum daily construction emissions, including 9.3 pounds per day of PM_{10}, are below YSAQMD significance thresholds, and annual emissions of ROG and NO_X are below the 10 tons per year thresholds. Implementation of **Regulatory Compliance Measure AIR-1**, which requires compliance with YSAQMD Rule 2.11 and standard dust control practices, would minimize fugitive dust emissions during construction. Additionally, operation of the proposed project would not exceed the significance criteria for daily ROG NO_X, and PM_{10} emissions. Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State AAQS.

With implementation of **Mitigation Measure AIR-1**, construction of the proposed project would not generate substantial emissions that could adversely affect nearby sensitive receptors. The project would also not result in other emissions, such as odors, that could affect a substantial number of people. The proposed project's construction- and operation-related regional daily emissions would remain below the YSAQMD significance thresholds for all criteria pollutants. In addition, compliance with YSAQMD rules and regulations on a project-by-project basis would further reduce potential impacts associated with the 26 cumulative projects identified in Chapter 4.0 and listed in Table 4.A, as well as regional air pollutant emissions within the SVAB. Therefore, the proposed project would not result in a cumulatively considerable contribution to air quality impacts, and cumulative air quality impacts would be **less than significant.**

4.3.8 Level of Significance Prior to Mitigation

Prior to mitigation, construction of the proposed project would result in a potentially significant impact related to increased cancer risk from toxic air contaminant emissions.

4.3.9 Regulatory Compliance Measures and Mitigation Measures

4.3.9.1 Regulatory Compliance Measures

The proposed project would be required to comply with the standards set forth in **Regulatory Compliance Measures AIR-1,** which is intended to implement the YSAQMD's Rule 2.11 to reduce fugitive dust impacts.

Regulatory Compliance Measure AIR-1

Fugitive Dust Measures. The City of West Sacramento or construction contractor shall implement the following measures at the project site:

- Water all active construction sites at least twice daily. Frequency shall be based on the type of operation, soil, and wind exposure.
- Haul trucks shall maintain at least 2 feet of freeboard;
- Cover all trucks hauling dirt, sand, or loose materials;

- Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut and fill operations and hydroseed area;
- Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days);
- Plant tree windbreaks on the windward perimeter of construction projects if adjacent to open land;
- Plant vegetative ground cover in disturbed areas as soon as possible;
- Cover inactive storage piles;
- Sweep streets if visible soil material is carried out from the construction site;
- Treat accesses to a distance of 100 feet from the paved road with a 6 to 12 inch layer of wood chips or mulch; and

4.3.9.2 Mitigation Measures

The following mitigation measure is required to reduce potentially significant impacts related to air quality to a less than significant level:

Mitigation Measure AIR-1 **Tier 3 Construction Equipment.** All off-road diesel-powered construction equipment of 25 horsepower or more used during construction of the proposed project shall be equipped with Tier 3 engines or higher, as certified by the California Air Resources Board. The equipment shall be properly maintained and tuned in accordance with manufacturer specifications. Prior to issuance of building permits, the Project Applicant shall submit construction plans to the City of West Sacramento denoting the projected equipment Tier rating that will be used during the construction period.

4.3.10 Level of Significance after Mitigation

Potentially significant impacts would be reduced to a less than significant level after mitigation. Therefore, with implementation of **Mitigation Measure AIR-1** and **Regulatory Compliance Measure AIR-1**, the proposed project would not result in any significant impacts related to air quality.

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4.4 BIOLOGICAL RESOURCES

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for the proposed Brar Farms Residential Development Project (proposed project) to impact biological resources in the City of West Sacramento (City). This analysis was prepared using methodologies and assumptions from the Biological Resources Report[1] prepared for the proposed project and included in **Appendix C** of this Draft EIR.

4.4.1 Scoping Process

Some comments received during the scoping period addressed biological resources. These comments raised concerns about the loss of habitat, wildlife displacement, and the proposed project's effect on special-status species and wildlife corridors.

4.4.2 Methodology

The analysis of potential impacts to biological resources is based on the site-specific biological resources impact analysis completed for the proposed project. The Biological Resources Report prepared for the proposed project is included in **Appendix C** of this Draft EIR.

The biological impact analysis included a literature review, records search, and general field investigation/habitat assessment, which are described in more detail below. In determining the level of significance, this analysis assumes that the construction and operation of the proposed project would comply with relevant federal and State laws and regulations, as well as applicable City policies.

4.4.2.1 Literature Review and Records Search

Prior to conducting the field investigation, a literature review and records search were conducted for special-status biological resources potentially occurring on or within the vicinity of the project site. Previously recorded occurrences of special-status plant and wildlife species and their proximity to the project site were determined through a query of the California Department of Fish and Wildlife's (CDFW) QuickView Tool in the Biogeographic Information and Observation System, the California Natural Diversity Database's (CNDDB) Rarefind 5, the California Native Plant Society's (CNPS) Electronic Inventory of Rare and Endangered Vascular Plants of California, the Calflora Database, a compendia of special-status species published by the CDFW, and the United States Fish and Wildlife Service (USFWS) species listings.

All available reports, survey results, and literature detailing the biological resources previously observed on or within the vicinity of the project site were reviewed to understand existing site conditions and note the extent of any disturbances that have occurred within the project site that would otherwise limit the distribution of special-status biological resources. Standard field guides and texts were reviewed for specific habitat requirements of special-status and non-special-status biological resources, as well as the following resources:

[1] LSA Associates, Inc. 2025. *Biological Resources Evaluation, Brar Farms Residential Development Project. West Sacramento, California.* October.

- Google Earth Pro historic aerial imagery (1985–2020)
- United States Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS) Soil Survey
- USFWS National Wetland Inventory
- USFWS Critical Habitat designations for Threatened and Endangered Species
- USFWS Endangered Species Profiles

The literature review provided a baseline from which to inventory the biological resources potentially occurring within the project site. The CNDDB was used, in conjunction with ArcGIS software, to locate the nearest recorded occurrences of special-status species and determine the distance from the project site. An updated CNDDB data search was completed on August 14, 2024, which is included in **Appendix C** of this Draft EIR. Since the completion of the 2025 Biological Resources Report, the listing status has changed for western spadefoot (*Spea hammondii*) and western pond turtle (*Emys marmorata*). No additional species have been identified or removed from the data search results.

4.4.2.2 Field Investigation

The general biological survey and vegetation mapping was conducted by LSA on April 4, 2025. The entire project site was surveyed on foot, noting vegetation communities, examining trees and shrubs closely for any nest structures, and identifying all birds and any other wildlife observed to determine if potential habitat to support special-status species was present. All plants and wildlife were identified to species, or to a sufficient level of taxonomy to ensure they were not special-status species. Wildlife was observed to determine wildlife use of the project site.

Vegetation in the project site was classified according to *A Manual of California Vegetation*.[2] Plant taxonomy and nomenclature in this document follows Baldwin et al.[3] and the Jepson Online Interchange for California Floristics.[4]

4.4.3 Existing Environmental Setting

The project site is regionally within the Sacramento Valley, with predominant natural habitats consisting of annual grasslands and oak woodlands. Primary land uses in the vicinity consist of suburban residential development and agriculture. The project site itself is an undeveloped lot that was historically used for agricultural purposes. At present, the project site is seasonally farmed for

[2] Sawyer, J.O., T. Keeler-Wolf, and J. Evens. 2009. *A Manual of California Vegetation,* Second Edition. California Native Plant Society, Sacramento, California.

[3] Baldwin, B.G., et al. eds. 2012. *The Jepson Manual: Vascular Plants of California*, Second Edition. University of California Press, Berkeley.

[4] Jepson Flora Project (eds.). 2025. Jepson eFlora. Website: www.ucjeps.berkley.edu/eflora/ (accessed February 2026).

hay by a volunteer farmer and maintained by the property owner, who mows and tills the land as needed.[5]

Topography in the project site is relatively level with a gentle slope to the southwest; the elevation is approximately 8 to 10 feet above mean sea level.[6]

4.4.3.1 Site Soils

Based on the USDA NRCS Web Soil Survey, the project site is underlain by Willows silty clay loam (0 0 percent slopes), and Willows clay (0 percent slopes). Willows series soils consist of very deep, poorly to very poorly drained sodic soils formed in alluvium from mixed rock sources. These soils are typical of flood basins and are often used for growing rice, sugar beets, and safflower. Willows series soils are considered hydric soils.[7]

According to the Geotechnical Engineering Report[8] (**Appendix E**) completed for the proposed project, the majority of the project site is underlain by brown, moist clay, and clay fill. As part of the subsurface exploration conducted for the proposed project, 12 test pits were excavated to depths ranging from 5 to 7 feet below ground surface. Soil conditions encountered at the test pit locations generally consisted of stiff to hard fat clay, which was found to extend through the full depth of exploration. One test pit, located in the northern end of the site, encountered 3 feet of lean clay fill underlain by similar native fat clay.

4.4.3.2 Vegetation

The entire Biological Study Area (BSA) is comprised of one semi-natural community, and ruderal grassland. Ruderal grasslands are defined as open-space herbaceous areas that have been subject to previous or ongoing disturbances such as scraped or graded land, mowing and/or grazing, and disturbed areas along roadsides, trails, and parking lots. These areas tend to be colonized by nonnative species that can quickly establish in poor soil and disturbed or waste areas. They generally have fast-growing roots, low nutritional needs, and produce massive amounts of seed.

4.4.3.3 Special-Status Plants

According to the CNDDB and CNPS, as of October 8, 2025, 33 special-status plant species have been recorded in the Sacramento West quadrangle. No special-status plant species were observed on site during the habitat assessment completed for the Biological Resources Report.

4.4.3.4 Special-Status Wildlife

According to the CNDDB, as of October 2025, 40 special-status wildlife species have been recorded in the Sacramento West quadrangle. Of the 40 special-status wildlife species, two species were either

5 Project Applicant. 2025. BI-weekly Meeting. Personal communication with LSA. March 26.

6 *Ibid.*

7 United States Department of Agriculture. Natural Resources Conservation Service. 2025. Web Soil Survey. Soil Survey Area: Yolo County, California. Survey Area Data: Version 23, September 3, 2025. Website: https://websoilsurvey.nrcs.usda.gov/app/ WebSoilSurvey.aspx (accessed February 2026).

8 Raney Geotechnical, Inc. 2024. *Geotechnical Engineering Report. Brar Farms Subdivision. 3425 Marshall Road. West Sacramento, California*. October.

observed or determined to have the potential to occur in the BSA or otherwise warranted further discussion. These species included Swainson's hawk (*Buteo swainsoni*) and white-tailed kite (*Elanus leucurus*).

Swainson's Hawk. Swainson's hawk is a State threatened species with no federal status. Most Swainson's hawk are long-distance migrants, leaving California by the end of October to winter in South America and returning north to nest by the end of March. Nests are built in the tops of large trees, often those associated with riparian habitats, or isolated trees in agricultural areas. They are known to forage up to 10 miles from their nest sites. Swainson's hawk are well documented in West Sacramento; there are 62 records of Swainson's hawk Within a 5-mile radius. The closest record (EONDX: 56606) is for a nest in a black walnut approximately 0.4 mile southeast of the BSA, last observed in 2005.

No focused surveys for listed special-status birds were conducted for the project, and no Swainson's hawk were observed. The potential for Swainson's hawk to occur within the project site is based on the literature search, visual assessments, and current scientific and commercial data available. The BSA does not contain suitable nesting habitat; however, ruderal grasslands provide suitable foraging habitat. Based on the presence of suitable foraging habitat and the high number of recorded occurrences, Swainson's hawk has a moderate potential to occur in the project site.

White-Tailed Kite. The white-tailed kite is a California fully protected species. This species population ranges from southwestern Washington, south through the Willamette Valley of Oregon, and down the entire coast of California and Central Valley to Baja California. This raptor species uses trees in open areas for nesting and open grasslands and marshes for foraging. There is one known record of occurrence in the CNDDB within 5 miles of the BSA. This record (EONDX: 114018) is for a nest in a large oak tree in a residential neighborhood approximately 2.7 miles northeast of the BSA, last observed in 2017.

No focused surveys for listed special-status birds were conducted for the project, and no white-tailed kites were observed. The potential for white-tailed kite to occur within the BSA is based on the literature search, visual assessments, and current scientific and commercial data available. The BSA does not contain suitable nesting habitat; however, ruderal grasslands provide suitable foraging habitat. Therefore, white-tailed kites have a low potential to occur in the project site.

4.4.3.5 Common Wildlife

Common wildlife species observed or expected to occur within the project site are those adapted to urban and suburban areas within Yolo County. Wildlife species observed during the field surveys include red-winged blackbird (*Agelaius phoeniceus*), rock pigeon (*Columba livia*), northern mockingbird (*Mimus polyglottos*), western meadowlark (*Sturnella neglecta*), mourning dove (*Zenaida macroura*), turkey vulture (*Cathartes aura*), killdeer (*Charadrius vociferus*), mallard (*Anas platyrhynchos*), Anna's hummingbird (*Calypte anna*), house sparrow (P*asser domesticus*), cliff swallow (*Petrochelidon pyrrhonota*), black phoebe (*Sayornis nigricans*), and western fence lizard (*Sceloporus occidentalis*). Other common wildlife species expected to occur in the area include red-tailed hawk (*Buteo jamaicensis*), California scrub jay (*Aphelocoma californica*), oak titmouse

(*Baeolophus inornatus*), house finch (*Haemorhous mexicanus*), Botta's pocket gopher (*Thomomys bottae*), raccoon (*Procyon lotor*), and striped skunk (*Mephitis mephitis*).

4.4.3.6 Sensitive Habitats

The literature review identified four special-status natural communities in the vicinity of the project site: elderberry savanna, great valley cottonwood riparian forest, northern claypan vernal pool, and northern hardpan vernal pool.

4.4.3.7 Delineation of Jurisdictional Waters

A query of the USFWS National Wetland Inventory determined that no riverine or other freshwater resources are mapped within the boundaries of the project site. However, two aquatic resources, including a 6.29-acre freshwater pond and a 3.39-acre freshwater pond are located 150 and 600 feet west of the project site, respectively.

In addition, during the field survey for the proposed project, a retention pond and a drainage ditch located to west of the project site were identified. The retention pond is in open space that is part of the Bridgeway Lakes Community Park. This pond is separated from the BSA by a drainage ditch that runs along approximately 1,000 feet of the western edge of the project site. The drainage ditch supports a variety of hydrophytic vegetation including tule (*Schoenoplectus acutus* var. *occidentalis*) and narrowleaf cattail (*Typha angustifolia*) with scattered sandbar willows (*Salix exigua*). The entirety of the drainage ditch and retention pond are outside of the project site.

4.4.4 Regulatory Setting

Federal, State, and local regulations and programs related to biological resources that are applicable to the proposed project are described below.

4.4.4.1 Federal Regulations

Federal Endangered Species Act of 1973. The federal Endangered Species Act (FESA) and subsequent amendments provide guidance for the conservation of endangered and threatened species and the ecosystems upon which they depend. FESA defines species as threatened or endangered and provides regulatory protection for listed species. FESA provides a program for the conservation and recovery of threatened and endangered species as well as the protection of designated critical habitat that the USFWS determines is required for the survival and recovery of listed species. The USFWS and National Marine Fisheries Service (NMFS) share responsibilities for administering FESA.

Section 9 of FESA prohibits the "take" of species listed by the USFWS as threatened or endangered. Although take of a listed species is prohibited, it is allowed when it is incidental to an otherwise legal activity. As defined by FESA, take means "...to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in such conduct." The definition of "harm" includes significant habitat modification or degradation that results in death or injury to listed species by significantly impairing behavioral patterns related to breeding, feeding, or shelter. "Harass" is defined as actions that create the likelihood of injury to listed species by significantly disrupting normal behavioral patterns related to breeding, feeding, and shelter.

Section 7 of FESA requires federal agencies, in consultation with and assistance from the Secretary of the Interior or the Secretary of Commerce, as appropriate, to ensure that actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of threatened or endangered species or result in the destruction of adverse modification of critical habitat for these species. Regulations governing interagency cooperation under Section 7 are found in California Code of Regulations (CCR) Title 50, Part 402. If an activity could result in "take" of a listed species as an incident of an otherwise lawful activity, then a biological opinion can be issued with an incidental take statement that exempts the activity from FESA's take prohibitions.

Section 10 provides a means whereby a nonfederal action with the potential to result in take of a listed species can be allowed under an incidental take permit. Application procedures are found at Code of Federal Regulations (CFR) Title 50, Sections 13 and 17 for species under the jurisdiction of USFWS and CFR, Title 50, Sections 217, 220, and 222 for species under the jurisdiction of NMFS. Section 10 would apply to the project if take of a species (as defined in Section 9) were determined to occur. The project area falls within the geographic region covered by the Yolo Habitat Conservation Plan/Natural Community Conservation Plan (Yolo HCP/NCCP or “Plan”) federal Incidental Take Permit (ITP), which provides local Section 10 compliance for covered species and activities for participating entities. West Sacramento is a participating entity in the Yolo HCP/NCCP.

Section 4(a)(3) and (b)(2) of FESA requires the designation of critical habitat to the maximum extent possible and prudent based on the best available scientific data and after considering the economic impacts of any designations. Critical habitat is defined in Section 3(5)(A) of FESA as (1) areas within the geographic range of a species that are occupied by individuals of that species and contain the primary constituent elements (physical and biological features) essential to the conservation of the species, thus warranting special management consideration or protection; and (2) areas outside of the geographic range of a species at the time of listing but that are considered essential to the conservation of the species.

Migratory Bird Treaty Act. The federal Migratory Bird Treaty Act (MBTA) governs take, possession, import, export, transport, selling, purchasing, or bartering of migratory birds and their eggs, parts, and nests, except as authorized under a valid permit. Section 704 of the MBTA states that the Secretary of the Interior is authorized and directed to determine if, and by what means, the take of migratory birds should be allowed and to adopt suitable regulations permitting and governing take while ensuring that take is compatible with protection of the species. Most bird species are protected under the MBTA.

In addition, under the California Fish and Game Code (CFGC), it is unlawful to take, possess, or needlessly destroy any bird or the nests or eggs of any bird species except as otherwise provided in the CFGC and regulations. This code also specifically protects raptors, including owls, and the CDFW considers a disturbance that results in nest abandonment or loss of reproductive effort as take. Disturbances of active nesting territories should be avoided during the nesting season.

Section 404 of the Clean Water Act. The United States Army Corps of Engineers (USACE) regulates discharges of dredged or fill material into waters of the United States. These waters include wetlands and non-wetland bodies of water that meet specific criteria. USACE’s regulatory jurisdiction, pursuant to Section 404 of the Clean Water Act (CWA) and current regulatory definitions, is founded

on a direct intermittent or perennial hydrological surface connection between the water body in question and waters subject to interstate commerce during typical years. The USACE typically regulates as non-wetland waters of the United States any body of water displaying an ordinary high water mark. To be considered a jurisdictional wetland under Section 404, an area must possess three wetland characteristics: hydrophytic vegetation, hydric soils, and wetland hydrology. Each characteristic must meet a specific set of mandatory wetland criteria. Based on the decision of *Sackett v. Environmental Protection Agency* on May 25, 2023, the Supreme Court ruled that the CWA extends only to wetlands that have a continuous surface connection with "waters" of the United States (i.e., with a relatively permanent body of water connected to any interstate waters, any waters connected to commerce, and any traditionally navigable waters). The United States Environmental Protection Agency and United States Department of the Army issued a final conforming rule on September 8, 2023, to amend the final "Revised Definition of "Waters of the United States'" rule. The discharge of dredged or fill material (temporarily or permanently) into waters of the United States (including wetlands) requires authorization from the USACE pursuant to Section 404 of the CWA.

4.4.4.2 State Regulations

California Endangered Species Act. The State of California enacted the California Endangered Species Act (CESA) in 1984. CESA is similar to FESA but pertains to State-listed endangered and threatened species. CESA requires State agencies to consult with the CDFW when preparing California Environmental Quality Act (CEQA) documents. The purpose is to ensure that the State lead agency actions do not jeopardize the continued existence of a listed species or result in the destruction or adverse modification of habitat essential to the continued existence of those species if there are reasonable and prudent alternatives available (CFGC Section 2080). As with FESA, for covered projects that may impact State-listed species under CESA, direct consultation with CDFW for State-listed take authorization will be required if the covered project may affect listed species. CDFW determines whether jeopardy to a species would occur as a result of a proposed project and identifies "reasonable and prudent alternatives" to the project consistent with conserving the species. CESA also allows CDFW to authorize exceptions to the State's prohibition against take of a listed species if the "take" of a listed species is incidental to carrying out an otherwise lawful project that has been approved under CEQA (CFGC Section 2081).

Under Section 2081 of the CFGC, the CDFW may authorize individuals or public agencies to import, export, take, or possess, any endangered, threatened, or candidate species in the State of California. These acts that are otherwise prohibited may be authorized through permits or memoranda of understanding if (1) the take is incidental to an otherwise lawful activity; (2) impacts of the authorized take are minimized and fully mitigated; (3) the permit is consistent with any regulations adopted pursuant to any recovery plan for the species; and (4) the applicant ensures adequate funding to implement the measures required by CDFW. The CDFW makes this determination based on the best scientific and other information that is reasonably available and includes consideration of the species' capability to survive and reproduce. The project area falls within the geographic region covered by the Yolo HCP/NCCP CDFW Incidental Take Permit (ITP) permit, which provides local Section 2081 compliance for covered species and activities for participating entities. West Sacramento is a participating entity in the Yolo HCP/NCCP.

California Environmental Quality Act. CEQA requires evaluation of a project's impacts on biological resources and provides guidelines and thresholds for use by lead agencies for evaluating the significance of proposed impacts. Furthermore, pursuant to *State CEQA Guidelines* Section 15380, CEQA provides protection for non-listed species that could potentially meet the criteria for State listing. For plants, CDFW recognizes that plants on Lists 1A, 1B, or 2 of the CNPS Inventory of Rare and Endangered Plants in California may meet the criteria for listing and should be considered under CEQA. CDFW also recommends protection of plants, which are regionally important, such as locally rare species, disjunct populations of more common plants, or plants on CNPS List 3 or 4.

California Natural Diversity Database. The CDFW administers the CNDDB, which maintains lists of special-interest plants, animals, and natural communities that occur within California. These particular natural communities, or habitat types, are designated as sensitive because of their rarity (e.g., very localized distribution, few scattered occurrences) and/or because of some threat (e.g., development, off-road vehicles) to this specific habitat type. The purpose of these listings is solely informational; there is no regulatory protection of these communities afforded by the CNDDB listings.

Sections 1600–1603 of the California Fish and Game Code. Pursuant to Division 2, Chapter 6, Sections 1600–1603 of the CFGC, the CDFW regulates all diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake, which supports fish or wildlife.

CDFW defines a stream (including creeks and rivers) as "body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having surface or subsurface flow that supports or has supported riparian vegetation." CDFW's definition of "lake" includes "natural lakes or manmade reservoirs." CDFW also defines a stream as "a body of water that flows, or has flowed, over a given course during the historic hydrologic regime, and where the width of its course can reasonably be identified by physical or biological indicators."

It is important to note that the CFGC defines fish and wildlife to include all wild animals, birds, plants, fish, amphibians, invertebrates, reptiles, and related ecological communities, including the habitat upon which they depend for continued viability (CFGC Division 5, Chapter 1, Section 45, and Division 2, Chapter 1, Section 711.2(a), respectively).

Furthermore, Division 2, Chapter 5, Article 6, Section 1600 et seq. of the CFGC does not limit jurisdiction to areas defined by specific flow events, seasonal changes in water flow, or presence/absence of vegetation types or communities.

California Fish and Game Code Section 3503. Sections 3503, 3503.5, and 3513 protect native birds. Mitigation for avoidance of impacts to nesting birds are typically necessary to comply with these sections of the CFGC in CEQA and other permitting documents. Specifically, Sections 3503, 3503.5, and 3513 of the CFGC prohibit the take, possession, or destruction of birds, their nests, or eggs.

California Fish and Game Code Sections 3511, 4700, 5050, and 5551. Sections 3511, 4700, 5050, and 5515 of the CFGC designate 37 fully protected species and prohibit the take or possession at any time of such species with certain limited exceptions.

California Native Plant Society. The CNPS is a nonprofit organization whose purpose is to promote the preservation of native California plants. The CNPS has compiled an inventory comprised of the information focusing on geographic distribution and qualitative characterization of Rare, Threatened, or Endangered vascular plant species of California. The list serves as the candidate list for listing as Threatened and Endangered by the CDFW.

Native Plant Protection Act. Sections 1900–1913 of the CFGC, the Native Plant Protection Act (NPPA), direct the CDFW to carry out the Legislature's intent to "… preserve, protect and enhance endangered or rare native plants of this state." The NPPA gives the California Fish and Game Commission the power to designate native plants as "endangered" or "rare" and protect endangered and rare plants from take.

Section 401 of the Clean Water Act. Section 401 of the CWA requires any applicant for a Section 404 permit to obtain certification from the State that the discharge (and the operation of the facility being constructed) will comply with the applicable effluent limitation and water quality standards. In California, this 401 certification is obtained from the RWQCB. The USACE, by law, cannot issue a Section 404 permit until a 401 certification is issued or waived. Areas subject to RWQCB jurisdiction typically coincide with those of the USACE (i.e., waters of the United States, including any wetlands). The RWQCB also asserts authority over waters of the State under waste discharge requirements (WDRs) pursuant to the California Porter-Cologne Water Quality Control Act (Porter-Cologne Act), but this mechanism is typically not invoked in cases where the USACE asserts permitting authority pursuant to the CWA.

4.4.4.3 Regional Regulations

Yolo HCP/NCCP. Assembly Bill (AB) 2172 authorizes the CDFW to enter agreements with any person or local, State, or federal agencies for preparing and implementing NCCPs and for preparing guidelines for developing and implementing NCCPs. The purpose of the NCCP program is to provide regional or area-wide protection for species and natural communities and to promote perpetuation of natural wildlife diversity while allowing compatible and appropriate development and growth. The focus of the NCCP program represents a dramatic shift from "individual species" to "habitat" preservation. An HCP is the federal counterpart to the NCCP. An HCP must meet Endangered Species Act (ESA) requirements and like the NCCP, it allows projects and activities to occur in endangered species' habitats by incorporating HCP-prescribed measures to avoid, minimize, or compensate for adverse effects on natural communities and endangered species.

The Yolo Habitat Conservancy (Conservancy) completed the Yolo HCP/NCCP or "Plan" in 2018 and began implementation on January 11, 2019. The Yolo HCP/NCCP is a countywide conservation plan to provide ESA permits and associated mitigation for infrastructure (e.g., roads and bridges) and development activities (e.g., agricultural facilities, housing, and commercial buildings) identified for construction over the next 50 years in Yolo County. The Yolo HCP/NCCP coordinates mitigation to maximize benefits to species, as well as conserve habitat above and beyond required mitigation for the following 12 identified species: palmate-bracted bird's beak (*Chloropyron palmatum*), valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*), California tiger salamander (*Ambystoma californiense*), western pond turtle (*Actinemys marmorata*), giant garter snake (*Thamnophis gigas*), Swainson's hawk (*Buteo swainsoni*), white-tailed kite (*Elanus leucurus*), western

yellow-billed cuckoo (*Coccyzus americanus occidentalis*), western burrowing owl (*Athene cunicularia*), least Bell's vireo (*Vireo bellii*), bank swallow (*Riparia riparia*), and tricolored blackbird (*Agelaius tricolor*).

The Yolo HCP/NCCP provides a comprehensive mitigation and conservation strategy that meets federal and State regulatory requirements in support of State and federal permits and will protect fish and wildlife and their habitats and fulfill the requirements of FESA and the California Natural Community and Conservation Planning Act.

The Yolo HCP/NCCP covers a total of 21,559 acres of activities in five categories. This includes 17,550 acres for urban and rural projects, 706 acres for public/private operations and maintenance, 956 acres for conservation strategy implementation, and 2,347 acres for neighboring landowner agreements. Proponents seeking ESA coverage for any of these listed activities are required to pay a land cover fee to the Conservancy. These fees provide the Conservancy with funding to build and manage the reserve system, as well as comply with permit conditions. The Conservancy updates fees annually. If a project affects wetlands, the Conservancy will add one of the three additional fees to the land cover fee.

The City of West Sacramento is a participating entity (i.e., "Permittee") in the Yolo HCP/NCCP and housing development projects are a covered activity under this Plan. The proposed project will likely receive ESA "take" coverage for special-status species under this Plan.

4.4.4.4 Local Regulations

City of West Sacramento 2035 General Plan. The Natural and Cultural Resources Element of the City's General Plan includes various goals and policies related to biological resources. Goals and policies applicable to the proposed project include:

- **Goal NCR-2:** To protect sensitive native vegetation and wildlife communities and habitats in West Sacramento.
    - **Policy NCR-2.2:** The City shall continue to work cooperatively with other jurisdictions in the county, and with State and Federal governments to conserve habitat through the preparation and implementation of the Yolo Habitat Conservancy Program. The goal of this effort shall be to preserve and enhance habitat values in appropriate large areas while allowing the orderly development within the incorporated areas of the county.
    - **Policy NCR-2.4:** The City shall require site-specific surveys for discretionary development proposals that could potentially impact biological resources to determine if any significant wildlife habitat and vegetation resources will be adversely affected, and if so, to identify appropriate measures to avoid or mitigate such impacts.
    - **Policy NCR-2.7:** The City shall preserve rare, threatened, and endangered species by ensuring that development does not adversely affect such species or by fully mitigating adverse effects. For developments where adverse impacts cannot be mitigated, the City shall not approve the project.

- **Policy NCR-2.8:** The City shall support State and Federal policies for preservation and enhancement of riparian and wetland habitats by incorporating, as deemed appropriate, the findings and recommendations of the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service into site-specific development proposals.

- **Policy NCR-2.9:** The City shall require new development to ensure no net loss of State and Federally regulated wetlands, other waters of the United States (including creeks, rivers, ponds, marshes, vernal pools, and other seasonal wetlands), and associated functions and values by regulating development in and near these habitats and promoting projects that avoid sensitive areas. Where habitat loss is unavoidable, the City shall require replacement consistent with State and Federal regulations protecting wetland resources.

- **Policy NCR-2.10:** The City shall seek to minimize the loss or degradation of wetland and riparian habitats at the following sites: Lake Washington and associated wetlands, Bee's Lake and associated riparian woodlands, riparian woodlands along the Sacramento River north of the I Street Bridge and south of the barge canal, and riparian woodlands along the Deep Water Ship Channel and the Yolo Bypass.

- **Policy NCR-2.14:** The City shall ensure that public access and recreation facilities do not eliminate or degrade riparian habitat values. Trails, picnic areas, and other improvements shall be sited to minimize impacts on sensitive wildlife habitat or riparian vegetation.

- **Policy NCR-2.15:** The City shall promote the use of native plants, especially valley oaks, for landscaping roadsides, medians, parks, and private properties. In particular, native plants should be used along the Sacramento River, in areas adjacent to riparian and wetland habitats, and in other open space and natural areas.

- **Goal NCR-3:** To protect existing mature trees and encourage the development of a healthy urban forest.

  - **Policy NCR-3.3:** The City shall maintain and implement the tree mitigation ordinance, which regulates the removal of existing trees, preserves existing trees where possible, and requires mitigation where healthy trees must be removed either by planting on-site, planting in another location approved by the Tree Administrator, or a combination of planting and a contribution to a Tree Mitigation Fund.

  - **Policy NCR-3.5:** The City shall require the planting of street trees, parking lot canopy trees, screening trees, and other amenity trees and landscaping in all new development, consistent with City landscaping development guidelines, to minimize the heat island effect.

  - **Policy NCR-3.8:** The City shall encourage property owners to maintain and protect trees on their property as well as street trees adjacent to their property.

City of West Sacramento Municipal Code The City's Municipal Code regulates impacts to Heritage Trees, Landmark Trees, and City Street Trees (Municipal Code Chapter 8.24). The Municipal Code (Section 8.24.090) also requires that a Tree Plan accompany an application for a development

project. A Tree Plan is required to include mapped tree locations, identification of tree impacts, and identification of tree protection measures for retained trees. The City's Municipal Code provides the following definitions for trees:

- **Heritage Tree:** any living tree with a trunk circumference of 75 inches or more or a native oak with a trunk circumference of 50 inches or more, both measured 4 feet, 6 inches from ground level. A native oak tree is defined as a living tree of any species of the Quercus genus (all oaks, including the nine native California oaks).

- **Landmark Tree:** any tree or stand of trees that is especially prominent or stately or that is of historical significance as designated by the City Council.

- **Street Tree:** any tree growing or placed within the tree maintenance strip or public right-of-way. All City Street Trees are protected trees regardless of size, species, or other attribute.

- **Tree:** any wooden perennial plant having one or several structural bearing trunk stems commonly achieving nine feet or more in height.

4.4.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the proposed project would have a significant adverse impact with respect to biological resources if it would:

Threshold 4.4.1: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;

Threshold 4.4.2: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;

Threshold 4.4.3: Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;

Threshold 4.4.4: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;

Threshold 4.4.5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or

Threshold 4.4.6: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

4.4.6 Project Impacts

Potential impacts to biological resources are discussed below. Please refer to Section 4.4.9 for a full text description of the regulatory compliance and/or mitigation measures referenced in the analysis below.

Threshold 4.4.1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant with Mitigation Incorporated. As described above in Section 4.4.3.3, Special-Status Plants, and Section 4.4.3.4, Special-Status Wildlife, no special-status plant species were observed in the project site during the reconnaissance surveys, and none are expected to occur within the project site. Of the 40 special-status wildlife species considered, two were either observed or determined to have the potential to occur in the project site: Swainson's hawk and white-tailed kite. As noted in Section 4.4.3.4, no Swainson's hawks were observed during the field surveys; however, the ruderal grasslands within the project site provide suitable foraging habitat, and this species has a moderate potential to occur in the project site. Similarly, no white-tailed kites were observed during the surveys; although the project site does not contain suitable nesting habitat, the ruderal grasslands within the project site provide suitable foraging habitat, and this species has a low potential to occur in the project site.

In addition, as described above in Section 4.4.3.5, Common Wildlife, numerous common wildlife species were observed or expected to occur within the project site. These species are generally adapted to urban and suburban areas within Yolo County. The project site and surrounding areas are heavily impacted by human activity (e.g., agriculture, recreational use of nearby open space, and residential development) and provide little to no connectivity between regional open spaces. While construction would temporarily displace these common wildlife species, the species present are widespread, highly mobile, and not dependent on this specific site. Therefore, temporary displacement would be localized and would not result in substantial impacts to these species.

Implementation of the proposed project would involve disturbance of the entire project site, resulting in the conversion of the site from ruderal grasslands to developed land uses and the permanent loss of 58.34 acres of potential foraging habitat for special-status wildlife.[9] Accordingly, development of the proposed project could adversely affect special-status wildlife species as a result of project-related activities. Construction activities would permanently remove 58.34 acres of

[9] The combined area of the five parcels that make up the project site totals an actual 58.34 acres, but is rounded up by the tax assessor to 60 acres. Accordingly, the project site is described as approximately 60 acres while the BSA reflects the project site acreage of the combined five parcels per the tax assessor database.

ruderal grasslands that provide suitable foraging habitat for Swainson's hawks, white-tailed kites, and other bird species protected under the MBTA and/or the CFGC. No suitable nest trees for Swainson's hawks or white-tailed kites were observed to occur within the project site; however, construction-related disturbance (e.g., noise, vehicle traffic, personnel working adjacent to occupied nesting habitat) could indirectly impact other nesting birds in the vicinity by causing adults to abandon nests, resulting in nest failure and reduced reproductive success if work occurs during the nesting season (February 1 to August 31). Therefore, the proposed project would have a **potentially significant impact** to Special-Status Species.

Consistent with the Yolo HCP/NCCP *Avoidance and Minimization Measure* (*AMM)16, Minimize Take and Adverse Effects on Swainson's Hawk and White-Tailed Kite*, **Mitigation Measures BIO-1** through **BIO-4**, would be required to implement to be implemented which require preconstruction nesting surveys, establishment of appropriate no-disturbance buffers around active nests, coordination with CDFW as needed, and biological monitoring during construction if work occurs within buffer areas. As such, implementation of **Mitigation Measures BIO-1** through **BIO-4** would reduce potentially significant impacts to Swainson's hawks, white-tailed kites, and other nesting birds to **less than significant with mitigation incorporated**.

In addition, as a participant of the Yolo HCP/NCCP, the developer(s) would be required to pay a land cover fee to the Conservancy to compensate for the loss of Swainson's hawk and white-tailed kite foraging habitat and the loss of grassland habitat in the region.

Threshold 4.4.2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. The field survey did not identify any riparian or other sensitive natural communities within the project site. The project site is characterized by ruderal grasslands. As such, implementation of the proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS, and **no impact** would occur. No mitigation is required.

Threshold 4.4.3: Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. As stated above in Section 4.4.3.7, Delineation of Jurisdictional Waters, according to the USFWS National Wetland Inventory[10] there are no riverine or other freshwater resources mapped within the boundaries of the project site. However, two aquatic resources, a 6.29-acre freshwater pond (approximately 150 feet west of the project site), and 3.39-acre freshwater pond (approximately 600 feet west of the project site) are located within the vicinity of the project site.

[10] United States Fish & Wildlife Service (USFWS). n.d. *National Wetlands Inventory.* Wetlands Mapper. Website: https://www.fws.gov/program/national-wetlands-inventory (accessed February 2026).

In addition, during the field survey, no aquatic resources were observed within the project site. The nearest aquatic resources include a retention pond and a drainage ditch west of the project site. The retention pond is in open space that is part of the Bridgeway Lakes Community Park. As such, the project site does not contain any aquatic resources. Therefore, the proposed project would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. There would be **no impact** and no mitigation is required.

Threshold 4.4.4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact. Habitat linkages provide connections between larger habitat areas that are separated by development. Wildlife corridors are similar to linkages but provide specific opportunities for animals to disperse or migrate between areas. A corridor can be defined as a linear landscape feature of sufficient width to allow animal movement between two comparatively undisturbed habitat fragments. Adequate cover is essential for a corridor to function as a wildlife movement area. It is possible for a habitat corridor to be adequate for one species yet still inadequate for others. Wildlife corridors are features that allow for the dispersal, seasonal migration, breeding, and foraging of a variety of wildlife species. Additionally, open space can provide a buffer against both human disturbance and natural fluctuations in resources.

The project site is bounded to the north by Marshall Road, to the east by Otis Avenueand a mix of residential and agricultural uses, to the south by single-family residential uses, and to the west by an existing retention pond that is part of the Bridgeway Lakes Community Park, and the Bridgeway Lakes residential development. In its exiting condition, the project site is an undeveloped lot that was historically used for agricultural purposes and is seasonally farmed for hay by a volunteer farmer and maintained by the property owner, who mows and tills the land as needed. There is no evidence that the ruderal grasslands in the project site provide a significant wildlife movement corridor or migration route. The project site is heavily impacted by human activity (e.g., agriculture, recreation use of nearby open space, residential occupation) and provides little to no connectivity between regional open spaces in the vicinity. The nearest significant wildlife movement corridors likely include the Sacramento River, the Yolo Bypass Wildlife Area, and the Sacramento River Deep Water Ship Channel.

Although migratory birds may opportunistically forage within the ruderal grasslands located within the project site, or forage or nest within trees, shrubs, and other vegetation surrounding the site, no nesting migratory birds were observed within or in the vicinity of the project site during field surveys. Specifically, as discussed in Section 4.4.3.4, the project site does not provide suitable nesting habitat for Swainson's hawk or white-tailed kite, though, it may provide suitable foraging habitat for these species. However, the site is subject to ongoing disturbance associated with routine agricultural maintenance and surrounding urban development, and does not contain suitable nesting habitat for these species. Furthermore, based on the results of the record search and field survey conducted for the project, it was determined that Swainson’s hawk species has no more than a moderate potential to occur on site and white-tailed kite has a low potential to occur on site. Upon

development of the proposed project, it is assumed that any migratory birds that opportunistically forage or otherwise utilize the project site would relocate to nearby higher-quality habitats, including the Yolo Bypass Wildlife Area, the Sacramento River corridor, and the Sacramento River Deep Water Ship Channel, which provide substantially greater and more suitable foraging and nesting habitat for migratory birds.

Native wildlife nursery sites are defined as sites where wildlife concentrate for hatching and/or raising young (e.g., rookeries, spawning areas, and bat colonies). No rookeries, spawning areas, or bat colonies are present in the project site. While the project could alter movement patterns for common wildlife species that are adapted to human-altered landscapes, it would not substantially interfere with the movement of native resident or migratory wildlife, or with established wildlife corridors. Because the project site is primarily surrounded by roads and residential developments, it would only provide minimal connectivity to larger regional habitats, a condition typical of urbanized and semi-developed areas. As a result, the proposed project would not interfere substantially with the movement of native resident wildlife or with established native resident or migratory wildlife corridors, and impacts to wildlife movement or nursery sites would be less than significant.

For these reasons, implementation of the proposed project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites and impacts would be **less than significant,** and no mitigation is required.

Threshold 4.4.5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

***Less than Significant Impact*.** The proposed project would be subject to the provisions of the City's Tree Preservation Ordinance, as discussed in Section 4.4.4.4, Local Regulations which regulates impacts to Heritage Trees, Landmark Trees, and City Street Trees. The Tree Preservation Ordinance also requires that all development projects prepare and submit a Tree Plan which includes mapped tree locations, identification of tree impacts, and identification of tree protection measures for retained trees.

During the field survey conducted on April 4, 2025, two trees were identified within the project site along Marshall Road: a valley oak (*Quercus lobata*) and an elm (*Ulmus* sp.). As discussed in Section 4.4.3, Existing Setting, the City's Municipal Code (Chapter 8.24) regulates impacts to Heritage Trees, Landmark Trees, and City Street Trees and requires preparation of a Tree Plan for development projects. Neither tree meets the definition of a "Heritage Tree," as defined in Section 8.24.020 of the City's Municipal Code, because the trunks do not meet the minimum circumference requirements (any living tree with a trunk circumference of 75 inches or more or a native oak with a trunk circumference of 50 inches or more, both measured 4 feet, 6 inches from ground level), nor do they meet the definition of "Landmark tree" or "Street tree." Accordingly, removal of these trees would not require issuance of a tree permit. However the proposed project would be required, consistent with Section 8.24.090 of the City's Municipal Code, to prepare and submit a Tree Plan identifying existing trees, trees proposed for removal or retention, and applicable tree protection measures, as specified in **Regulatory Compliance Measure BIO-1.**

Therefore, with adherence to City's Municipal Code and **Regulatory Compliance Measure BIO-1**, the project would not conflict with local policies or ordinances protecting biological resources and this impact would be **less than significant.**

Threshold 4.4.6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Less Than Significant with Mitigation Incorporated. The project site is within the area covered by the Yolo HCP/NCCP. As discussed above under Threshold 4.4.1, implementation of the proposed project would involve disturbance of the approximately 60-acre project site, resulting in the conversion of the site from ruderal grasslands to developed land uses and the permanent loss of 58.34 acres of potential foraging habitat for special-status wildlife. Accordingly, development of the proposed project could adversely affect special-status wildlife species as a result of project-related activities. Construction activities would also permanently remove 58.34 acres of ruderal grasslands that provide suitable foraging habitat for Swainson's hawks, white-tailed kites, both of which have the potential to occur within the project site and are covered species under the Yolo HCP/NCCP. Therefore, the proposed project would have a **potentially significant impact** on covered species and their habitat under the Yolo HCP/NCCP. However, with implementation of **Mitigation Measures BIO-1** through **BIO-4**, which require preconstruction nesting surveys, establishment of appropriate no-disturbance buffers around active nests, coordination with CDFW as needed, and biological monitoring during construction if work occurs within buffer areas consistent with the Yolo HCP/NCCP *AMM 16, Minimize Take and Adverse Effects on Swainson's Hawk and White-Tailed Kite*; implementation of **Mitigation Measures BIO-5** through **BIO-8**, which require worker training, confining and delineating work areas, controlling nighttime lighting, and minimizing impacts from staging and temporary work areas; and adherence to **Regulatory Compliance Measure BIO-2**, which requires compliance with HCP/NCCP application and fee requirements, would reduce impacts on covered species to a **less than significant** level.

4.4.7 Cumulative Impacts

Less Than Significant with Mitigation Incorporated. As defined in Section 15355(b) of the *State CEQA Guidelines*, cumulative impacts refer to the incremental impacts of the project added to other closely related past, present, and reasonably foreseeable probable future projects. The cumulative study area for biological resources is described in Chapter 4.0; the cumulative project list is provided in Chapter 4.0, **Table 4.A**, and a map of the cumulative project locations is provided in Chapter 4.0, **Figure 4-1**.

As detailed in this section, the proposed project would have no impact on aquatic resources or wildlife migratory wildlife corridors. Because the proposed project would have no impact on the biological resources listed above, it would not contribute to a cumulatively considerable impact on these biological resources. Therefore, there would be no cumulatively significant impact on these biological resources.

As described above under Threshold 4.4.1, the proposed project would result in the permanent conversion of approximately 58.34 acres of ruderal grasslands to developed land uses, representing

a permanent loss of potential foraging habitat for Swainson's hawk, white-tailed kite, and other bird species protected under the MBTA and the CFGC resulting in a potentially significant impact to special-status species. Implementation of **Mitigation Measures BIO-1** through **BIO-4**, which require preconstruction surveys, establishment of no-disturbance buffers, coordination with CDFW, and biological monitoring during construction, would reduce potential impacts to nesting birds to a less-than-significant level. Although all projects within the cumulative study area would likely result in the loss of habit, each cumulative project would be required to adhere to project specific mitigation measures and comply with the measures in the Yolo HCP/NCCP. Additionally, as a participant in the Yolo HCP/NCCP, the project would contribute fees to offset the loss of Swainson's hawk and white-tailed kite foraging habitat. As such, all projects within the cumulative study area would be required to comply with the MBTA and the CFGC to address potential impacts to nesting birds.

As discussed under Threshold 4.4.5, implementation of the proposed project would result in the removal of two trees along Marshall Road. The project would be required to obtain a tree permit pursuant to **Regulatory Compliance Measure BIO-1** and, in accordance with the West Sacramento Landscape Development Guidelines, mitigate for tree loss through on-site replacement plantings or payment of an in-lieu fee to the City. All other projects in the cumulative study area that would require tree removal would be subject to the City's Tree Ordinance.

Additionally, as discussed under Threshold 4.4.6, the project site is within the Yolo NCCP/HCP and implementation of the proposed project could adversely affect special-status wildlife species as a result of project-related activities. Additionally, construction activities would also permanently remove 58.34 acres of ruderal grasslands that provide suitable foraging habitat for Swainson's hawks, white-tailed kites, both of which have the potential to occur within the project site and are covered species under the Yolo HCP/NCCP. Therefore, the proposed project would have a potentially significant impact on covered species and their habitat under the Yolo HCP/NCCP. With implementation of **Mitigation Measures BIO-1** through **BIO-4**, which require preconstruction nesting surveys, establishment of appropriate no-disturbance buffers around active nests, coordination with CDFW as needed, and biological monitoring during construction if work occurs within buffer areas consistent with the Yolo HCP/NCCP *AMM 16, Minimize Take and Adverse Effects on Swainson's Hawk and White-Tailed Kite*; implementation of **Mitigation Measures BIO-5** through **BIO-8**, which require worker training, confining and delineating work areas, controlling nighttime lighting, and minimizing impacts from staging and temporary work areas; and adherence to **Regulatory Compliance Measure BIO-2**, which requires compliance with HCP/NCCP application and fee requirements, would reduce impacts on covered species to a less than significant level. Furthermore, all other projects in the cumulative study area would be required to comply with the provisions of the HCP/NCCP. Therefore, the proposed project's contribution to cumulative impacts on covered species and habitats under the Yolo NCCP/HCP would be less than significant.

Overall, since all projects within the cumulative study area would be required to implement appropriate regulatory mitigation measures to avoid impacts to special-status wildlife species, nursery sites, sensitive natural communities, and tree removals, implementation of the proposed project, when evaluated in combination with the development of projects listed in **Table 4.A**, would not contribute to a cumulatively considerable impact on biological resources. Therefore, when considered in conjunction with past, present, and probable future projects, project impacts

pertaining to biological resources would be less than cumulatively considerable with compliance with **Regulatory Compliance Measures BIO-1** and **BIO-2** and inclusion of **Mitigation Measures BIO-1** through **BIO-8.**

4.4.8 Level of Significance Prior to Mitigation

Potential adverse impacts to Swainson's hawk, white-tailed kite, and other nesting bird habitat, and conflicts with local policies, ordinances, or provisions of the Yolo HCP/NCCP would be potentially significant prior to implementation of mitigation measures. The proposed project would have a less than significant impact to tree preservation policies or ordinances prior to compliance with applicable requirements.

4.4.9 Regulatory Compliance Measures and Mitigation Measures

4.4.9.1 Regulatory Compliance Measures

Regulatory Compliance Measure BIO-1

Tree Plan. The project applicants shall submit, along with their application for project development, a detailed tree plan. The tree plan shall contain the information detailed in Ordinance 8.24.090, including a contour map showing the location, size, species, and condition of all trees located on the property proposed for development; identification of the trees proposed to be preserved and those heritage, landmark, and street trees proposed to be removed and the reason for their removal; description of the measures to be followed to ensure survival of heritage, landmark, and street trees during construction; a program for the preservation of these trees during and after completion of the project; and a program for the replacement of any trees proposed to be removed.

Regulatory Compliance Measure BIO-2

Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP) Application Package. The Project Applicant shall submit an HCP/NCCP application package to the City. The City shall undertake review of take authorization applications concurrent with California Environmental Quality Act (CEQA) environmental review. This review shall include consideration of CEQA exemptions and whether a project is covered by a prior programmatic or earlier CEQA document. To facilitate this approach, the City should require project proponents to submit initial HCP/NCCP application package information as part of the land use approval application and CEQA process.

- HCP/NCCP Application Package. Private project proponents covered by the Yolo HCP/NCCP must complete an HCP/NCCP application package. Proponents of private projects under the discretion of Permittees must submit the application to the relevant Permittee for review and approval to receive coverage under this HCP/NCCP. The project proponent is responsible for preparing the application package and conducting any necessary field surveys, if required. The application package must contain the items listed below, if applicable:

    1. Project application form. The project application form will contain basic information about the project. The Conservancy will provide required forms through the websites of the Permittees and the Conservancy.

    2. Project description, vicinity map, and detail map. The application package will include a brief project description, vicinity map, and detail map. The project description will include the location, assessor's parcel number(s), construction activity or maintenance methods, a description of the nature of the impacts (permanent or temporary), and timing (including duration) of the project or activity. The project description will document that the project is a covered activity (Chapter 3, *Covered Activities*). The vicinity map will document that the project site is in the HCP/NCCP Plan area and include any streams or water bodies that fall within the project area. The detail map will show the fee area, also known as the area of impact. This is the area the Conservancy will use to determine fees, as described in Chapter 8, Section 8.4.1.2, *Land Cover Fee*. The Conservancy will provide further guidance in the implementation handbook for identification of the area of impact. The detailed map must also show any relevant landforms, roads, water bodies, and existing and proposed structures that will be affected by the proposed project.

3. Land cover mapping and planning-level surveys. The project proponent will retain a qualified biologist to conduct planning-level surveys and identify natural communities and important elements of covered species habitat in the area of impact. Planning-level surveys provide information on the natural communities and covered species present at a project site to comply with the AMMs (Section 4.3, *Avoidance and Minimization Measures*) and document key resources for tracking and reporting purposes. These surveys are required for all covered activities that result in ground disturbance or other effects that could result in take of covered species or natural communities.

4. Verification of land cover impacts. Based on the maps created during planning-level surveys, as described in Section 4.2.2.3, Item 3: *Land Cover Mapping and Planning-Level Surve*ys, the project proponent must provide the acres of effect (and linear feet of impacts for stream channels) in the area of impact (defined in Section 8.4.1.2, *Land Cover Fee*) by land cover type (Table 2-1, *Natural Communities and Other Land Cover Types*). The Conservancy will use these calculations to track natural community and covered species habitat loss under this HCP/NCCP by land cover type. The tracking must be based on actual loss of each land cover type. See Section 7.5.11, *Compliance Tracking*, for appropriate data sources for effect calculations. Permittee planning staff members or the Conservancy will verify that a qualified biologist completed the land cover mapping and calculations. Permittee planning staff members will verify land cover data determinations provided by all project proponents within the Permittee's jurisdiction, and the Conservancy will verify all land cover data determinations provided by Specialized Professional Entities (SPEs) (see Chapter 8, Section 8.4.1.2, *Land Cover Fee*, for a description of area of impact). The Permittee and the Conservancy will verify land cover data determinations at the time

applications are submitted because of the potential for land cover to change over time.

5. Avoidance and minimization measure plan. Based on the results of steps 1 and 3, above, the project proponent will identify applicable AMMs and include these in an AMM plan, which will be submitted with the application package. The project proponent will include monitoring requirements in the AMM plan and surveys provided by a qualified biologists, as needed, based on requirements described in Section 4.3, *Avoidance and Minimization Measures*.

6. HCP/NCCP Fees or Equivalent Mitigation. The project proponent will estimate fees based on the information provided, using a fee calculator developed by the Conservancy and the calculation methods described in Section 8.4.1.2, *Land Cover Fee*. If the project proponent proposes to purchase credits at a United States Fish and Wildlife Service (USFWS) - or CDFW-approved mitigation bank, the proponent must indicate this upon project approval. The Conservancy may authorize use of an approved mitigation bank or mitigation receiving site for in-county mitigation if it meets HCP/NCCP requirements, including monitoring and adaptive management requirements, and pays all appropriate fees.

4.4.9.2 Mitigation Measures

The following mitigation measures are required to reduce potentially significant impacts related to biological resources to a less than significant level:

Mitigation Measure BIO-1

Preconstruction Surveys (Swainson's Hawks and White-Tailed Kite). In accordance with guidance provided by the Swainson's Hawk Technical Advisory Committee (2000), if work begins during the nesting season (March 15 to August 30), an early season preconstruction survey for nesting Swainson's hawks shall be conducted between January and March in the Biological Study Area (BSA) and immediate vicinity (an approximately 1,320-foot [0.25-mile] radius) by a qualified biologist when tree foliage is relatively sparse and nests are easy to identify.

A second preconstruction survey for nesting Swainson's hawk shall be conducted in the BSA and immediate vicinity (an approximately 1,320-foot [0.25-mile] radius) by a qualified biologist no more than 15 days prior to initiation of earth-moving activities.

Mitigation Measure BIO-2

Active Nest Buffer (Swainson's Hawk and White-Tailed Kite). If nesting Swainson's hawk or white-tailed kite are found within the survey area, a 1,320-foot (0.25-mile) initial temporary nest disturbance buffer shall be established. If project activities within the temporary nest disturbance buffer are determined to be necessary during the nesting season, a qualified biologist shall evaluate the potential for the project to disturb nesting activities. California Department of Fish and Wildlife (CDFW) shall be contacted to review the evaluation and determine if the project can proceed without adversely affecting nesting activities. Work will only be allowed to proceed within the temporary nest disturbance buffer.

Disturbance of active nests shall be avoided until it is determined by a qualified biologist that nesting is complete and the young have fledged or that the nest has failed. Work is allowed to proceed within the temporary nest disturbance buffer if Swainson's hawk are not exhibiting agitated behavior (e.g., defensive flights at intruders, getting up from a brooding position, flying off the nest). A qualified biologist shall be on-site daily while construction activities are occurring within the temporary nest disturbance buffer to monitor nesting activity. The monitor shall have the authority to stop work if it is determined the project is adversely affecting nesting activities.

Mitigation Measure BIO-3

Preconstruction Survey (Nesting Birds). If work begins during the nesting season (February 1 and August 31), preconstruction surveys shall be conducted by a qualified biologist no more than 14 days prior to commencement of any construction activities.

Mitigation Measure BIO-4

Active Nest Buffer (Nesting Birds). If active nests are identified during the preconstruction survey(s), appropriate buffers shall be established to protect nesting activity. The width of the buffer zone shall be based on a site-specific analysis considering the species, nest location, and observed behavior prepared by a

qualified Biologist. Initial buffer standards shall be a minimum of 25 feet for non-raptor bird species and a minimum of 250 feet for raptor species. All construction work shall be conducted outside any designated avoidance zones. Standard buffer zones shorter or larger than minimum buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The biologist shall have full discretion for establishing a suitable buffer. The buffer area(s) shall be closed to all construction personnel and equipment until the young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed and young have fledged the nest prior to removal of the avoidance buffer.

Mitigation Measure BIO-5

Confine and Delineate Work Area. Mitigation Measure BIO-5 applies Yolo HCP/NCCP Avoidance and Minimization Measure (AMM) 3. Where natural communities and covered species habitat are present, workers shall confine land clearing to the minimum area necessary to facilitate construction activities. Workers shall restrict movement of heavy equipment to and from the project site to established roadways to minimize natural community and covered species habitat disturbance. The Project Applicant shall clearly identify boundaries of work areas using temporary fencing or equivalent and shall identify areas designated as environmentally sensitive. All construction vehicles, other equipment, and personnel shall avoid these designated areas.

Mitigation Measure BIO-6

Conduct Worker Training. Mitigation Measure BIO-6 applies Yolo HCP/NCCP AMM 6. All construction personnel shall participate in a worker environmental training program approved/authorized by the Conservancy and administered by a qualified biologist. The training shall provide education regarding sensitive natural communities and covered species and their habitats, the need to avoid adverse effects, State and federal protection, and the legal implications of violating the FESA and NCCPA Permits. A pre-recorded video presentation by a qualified biologist shown to construction personnel may fulfill the training requirement.

Mitigation Measure BIO-7

Control Nighttime Lighting of Project Construction Sites. Mitigation Measure BIO-7 applies Yolo HCP/NCCP AMM 7. Workers shall direct all lights for nighttime lighting of project construction sites into the project construction area and minimize the lighting of natural habitat areas adjacent to the project construction area.

Mitigation Measure BIO-8

Avoid and Minimize Effects of Construction Staging Areas and Temporary Work Areas. The Project Applicant should locate construction staging and other temporary work areas for covered activities in areas that would ultimately be a part of the permanent project development footprint. If construction staging and other temporary work areas must be located outside of permanent project footprints, they shall be located either in areas that do not support habitat for covered species or are easily restored to prior or improved ecological functions (e.g., grassland and agricultural land). Construction staging and other temporary work areas located outside of project footprints shall be sited in areas that avoid adverse effects on the following:

- Serpentine, valley oak woodland, alkali prairie, vernal pool complex, valley foothill riparian, and fresh emergent wetland land cover types.
- Occupied western burrowing owl burrows. [Occupied for the purpose of AMM 8 means at least one burrowing owl has been observed occupying the burrow within the last three years. Occupancy of a burrow may also be indicated by owl sign at the burrow entrance, including molted feathers, cast pellets, prey remains, eggshell fragments, or excrement at or near a burrow entrance or perch site]
- Nest sites for covered bird species and all raptors, including noncovered raptors, during the breeding season.

The Project Applicant shall follow specific Avoidance and Minimization Measures (AMMs) for sensitive natural communities as identified in Section 4.3.3, Sensitive Natural Communities and Section 4.3.4, Covered Species of the Yolo HCP/NCCP. For establishment of temporary work areas outside of the project footprint, project

proponents shall conduct surveys to determine if any of the biological resources listed above are present.

Within one year following removal of land cover, project proponents will restore temporary work and staging areas to a condition equal to or greater than the covered species habitat function of the affected habitat. Restoration of vegetation in temporary work and staging areas will use clean, native seed mixes approved by the Yolo Habitat Conservancy (Conservancy) that are free of noxious plant species seeds.

4.4.10 Level of Significance after Mitigation

With compliance with **Regulatory Compliance Measure BIO-1** and **BIO-2** and implementation of **Mitigation Measures BIO-1** through **BIO-8**, potential impacts to Swainson's hawk, white-tailed kite, other nesting birds, and trees would be reduced to less than significant levels**.** The project would not result in significant impacts to riparian habitat, sensitive natural communities, jurisdictional waters, or other protected resources.

4.5 CULTURAL RESOURCES

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for the proposed Brar Farms Residential Development Project (proposed project) to impact cultural resources in the City of West Sacramento (City). Cultural resources are sites, buildings, structures, objects, and districts over 50 years old that may have traditional or cultural value for the historical significance they possess. The background information and evaluation of impacts related to cultural resources as presented in this section is based on the Cultural Resources Assessment (provided in **Appendix D**)[1] that was prepared for the proposed project and the Phase I Environmental Site Assessment (Phase I ESA provided in **Appendix F**),[2] as well as applicable provisions of the City's General Plan.

4.5.1 Scoping Process

One comment was received during the scoping period addressed cultural resources. This comment outlined the City's tribal consultation requirements under Assembly Bill (AB) 52 and Senate Bill (SB) 18.

4.5.2 Methodology

The analysis of potential impacts to cultural resources is based on the site-specific cultural resources impact analysis completed for the proposed project. There have been no changes to existing site conditions since the Cultural Resources Assessment was prepared in July 2025, and the conclusions of the report remain valid for the following analysis.

The cultural resource assessment included a literature and records search, a search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF), a paleontological overview, and an intensive cultural resource pedestrian survey.

The archaeological records search, which was conducted by the Northwest Information Center (NWIC), included a review of all recorded historic and prehistoric cultural resources, as well as a review of known cultural resources, and survey and excavation reports generated from projects completed within one mile of the project site.

The literature review included the National Register of Historic Places (National Register), the California Register of Historical Resources (California Register), and documents and inventories from the California Office of Historic Preservation (OHP) including the lists of California Historical Landmarks, California Points of Historical Interest, Listing of National Register Properties, and the Built Environment Resources Directory (BERD).

4.5.2.1 Archaeological Field Survey

LSA archaeologists conducted a pedestrian field survey of the project area on May 20, 2025. Most of the project area consisted of a hayfield under cultivation. At the time of survey, the hay on the project site had been recently cut and raked into windrows. The archaeologists walked transects

1 LSA Associates Inc. 2025. *Cultural Resources Assessment, Brar Farms Residential Development Project.* October.

2 Partner Engineering and Science, Inc. 2021. *Phase I Environmental Site Assessment Report.*

spaced approximately 25 meters (82 feet) apart in the hay stubble. Visibility was generally fair to good, ranging from roughly 50 to 90 percent soil exposure. Part of the project area along Marshall Road was overgrown by vegetation, particularly around historic-period structures that had been previously removed. Where feasible, meandering transects were used to examine sparse exposures of soil among the vegetation. Vegetation around the former structures was tall and dense, making the area inaccessible and unsafe due to the high potential for snakes. Soil consisted of brown dry clay with deep desiccation cracks. Recently dumped refuse was found along Marshall Road. There is the potential for surface and subsurface remnant materials and features relating to past structures, including a well, in the overgrown area.

4.5.3 Existing Environmental Setting

4.5.3.1 Natural Setting

The project is located between the Sacramento River Deep Water Ship Channel and the west bank of the Sacramento River. The westernmost part of the project area is bounded by the Bridgeway retention pond, which is part of the Bridgeway Lakes Community Park, and the Bridgeway Lakes residential development. Although the project itself rests on loose disced soil from previous tilling activities, the surrounding floodplain would historically have featured tule marsh habitat.[3] This freshwater wetland environment is one of the most productive wildlife habitats in California, providing food, cover, and water for hundreds of species of birds, mammals, reptiles, and amphibians.[4] The tule marsh is characterized by the eponymously named tule plant (*Schoenoplectus* and *Scirpus* spp.), which was widely used by pre-contact and historic-period native populations in California to make a range of important items, including boats, dwellings, clothing, mats, and baskets.

4.5.3.2 Geology

The project site was the previous location of H&H Nishimura Farms and was historically used for agricultural purposes.[5] Below the disced soil, the project area as situated is mapped as Holocene basin deposits.[6] Sediments in this unit are described as fine-grained sediments of late Holocene age with horizontal stratification deposited by standing or slow-moving water in topographic lows.

Few older pre-contact sites have been discovered near the project area in the Sacramento Valley due to on-going alluvial processes. However, recent studies in the Sacramento Valley have successfully identified buried older soils with associated pre-contact archaeological deposits.[7]

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3 Küchler, A.W. 1977. *Natural Vegetation of California.* University of Kansas, Lawrence.

4 Kramer, Gary. n.d. Fresh Emergent Wetland. California Wildlife Habitat Relationships System, California Department of Fish and Game, California Interagency Wildlife Task Group. Website: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=67390 (accessed April 2025).

5 Küchler, A.W. 1977. *Natural Vegetation of California.* University of Kansas, Lawrence.

6 Gutierrez, C.I. 2011. *Preliminary Geologic Map of the Sacramento 30' x 60' quadrangle, California*. California Geological Survey. Preliminary Geologic Maps PGM-11-06.

7 Ugan, Andrew, Jeffrey Rosenthal, and Jack Meyer. 2024. *Geomorphology and Prehistoric Site Distribution Near Hamilton City, California, and Their Implications for the Archaeological Record of the Sacramento Valley.* California Archaeology 16(1): 55-89.

4.5.3.3 Historical Setting

A review of historical aerial imagery from the Phase I ESA (see **Appendix F**) indicates that the project area has been used for agricultural purposes since at least 1937. In 1957, a structure was erected in the northeastern portion of the site, with the main house constructed in 1964. A field survey conducted by LSA on May 20, 2025, confirmed that all structures have since been removed and that no standing structures remain on-site.

4.5.3.4 Cultural Setting

Ethnography. The project area is near the intersection of the traditional cultural territories of the Nisenan and Plains Miwok. The Nisenan generally occupied an area that stretched east-west from the crest of the Sierra Nevada to the Sacramento River, and north-south from between the Yuba and Feather rivers to between the American and Cosumnes rivers. The Plains Miwok lived along the lower reaches of the Mokelumne and Cosumnes rivers and along the Sacramento River between Rio Vista and Freeport.

At the time of European contact, the native populations in the Central Valley spoke seven distinct languages of the Penutian stock: Wintu, Nomlaki, Konkow, River Patwin, Nisenan, Miwok, and Yokuts. Shared linguistic roots along with common technological, economic, ceremonial, and sociopolitical characteristics indicate these groups "had a related history and regular interaction."[8]

Nisenan. The basic social and economic group for the Nisenan was the family or household unit; these units combined into distinct villages, each largely kin-based. Lineage groups were important political and economic units that combined to form tribelets, which were the largest sociopolitical unit identified for Nisenan. Each tribelet "owned" a bounded tract of land and exercised control over its natural resources.[9]

During most of the year, Nisenan usually lived in permanent villages that typically were positioned near watercourses on low natural rises, ridges, or large flats. Villages included family dwellings, acorn granaries, a sweathouse, and in major villages, a dance house. The availability of resources was considered in the location of permanent villages, since the Nisenan acquired a proportion of their food resources from the general area surrounding them. Other essential food resources were obtained during the summer and fall, when small base camps were established at higher altitudes in proximity to a water source. Food-gathering expeditions were staged from these camps to acquire natural, faunal, and plant resources.

Plains Miwok. Information about Plains Miwok culture is sparse due to the devastation and disruption in the early 19th century brought about by Spanish-introduced epidemics and relocation to Spanish missions, where many Plains Miwok died or were consolidated with other Native California groups. The Plains Miwok, along with other Central California native groups, were

8 Rosenthal, Jeffrey S., Gregory G. White, and Mark Q. Sutton. 2007. *The Central Valley: A View from the Catbird's Seat. In California Prehistory: Colonization, Culture, and Complexity*, edited by T.L. Jones and K.A. Klar, pp.147-163. Altamira Press, Lanham, Maryland.

9 Morris, Pete. 2018. *Cultural Resources Inventory Report, Lincoln Crossing South Elementary School, Placer County, California.* ECORP Consulting, Inc., Rocklin, California.

intensive food collectors who prioritized plant resources and focused secondarily on fishing and hunting. Acorns were a staple food with other seeds, nuts, roots, and so on as important supplemental foods. The emphasis on plant foods is reflected by the many Plains Miwok artifacts relating to plant food preparation.[10]

Politically, the Plains Miwok were organized into groups previously mentioned that anthropologists termed tribelets. Each of these independent groups maintained a territorial boundary and control over the territory's resources. Within each tribelet's territory were several more or less permanently inhabited settlements and numerous seasonally occupied campsites. Large, multi-lineage villages were located on watercourses, and most were permanently occupied except during the fall acorn harvest. The villages included domed dwellings thatched with tule or grass, and round semi-subterranean earth-covered sweathouses. Assembly houses featured a similar construction to sweat houses but were only built in major villages.[11]

4.5.3.5 Records Search

According to the data obtained from the NWIC records search, one cultural resource has been documented within the project area (57-001628) and another two cultural resources have been documented within 0.25 mile of the project area (57-001628 and 57-000737). No typical reports have been documented within the project area and two typical reports have been documented within 0.25 mile of the project area (13969 and 38407).

The resource with the project area, 57-001628, encompasses the eastern half of the project area and extends into and beyond the 0.25-mile buffer area. This resource describes a tribal cultural landscape identified by the Nisenan and Plains Miwok as *Waka-ce/Waka-Ly*, or Wilton Rancheria. This resource encompasses the landscape of the Lower Sacramento River and includes waterways, tule habitat, fisheries, and other wildlife. These natural resources served as critical resources for local inhabitants. According to NWIC records, resource 57-00073, lies roughly 250 meters east of the project area, but within the 0.25-mile buffer area. This resource is a 4-mile-long, 100-foot wide, historic drainage canal that was designed in 1911 to develop the town of West Sacramento.

The NWIC indicated that no typical reports were produced within the project area; however, ten "other" reports were produced within the project area. These reports include: 595, 2960, 5208, 7821, 9795, 12790, 17835, 30204, 32596, and 51085 (see **Table 4.5.A: Reports Within the Project Area**). The NWIC indicated that two typical reports, 13969 and 38407, and eleven "other" reports were produced within 0.25 mile of the project area.

[10] Bennyhoff, James A. 1977. *Ethnogeography of the Plains Miwok. Center for Archaeological Research at Davis.* Publication No. 5. University of California, Davis.

[11] *Ibid.*

Table 4.5.A: Cultural Resource Report Records Within the Project Area

Report #	Year	Title
595	1974	A Report on the Status of Generally Available Data Regarding Archaeological, Ethnographic, and Historical Resources Within a Fiver Mile Wide Corridor Through Portions of Colusa, Yolo, Solano, and Contra Costa Counties, California
2960	1966	Recent Investigations into the Temporal Relationships of the Central Sierra Nevada Foothill Archaeological Sites
5208	1977	Sacramento- San Joaquin Delta Investigations: Cultural Resources Reconnaissance
7821	1985	An Ethnographic Summary for the East Yolo Development Project Yolo County, California
9795	1986	Late Prehistoric Obsidian Exchange in Central California (PhD Dissertation)
12790	1991	Sacramento- San Joaquin Delta, California Historical Resources Overview
17835	1975	Biological Distance of Prehistoric Central California Populations Derived From Non-Metric Traits of the Cranium (PhD Dissertation)
30204	2003	The Distribution and Antiquity of the California Pecked Curvilinear Nucleated (PCN) Rock Art Tradition
32596	2006	The Central California Ethnographic Community Distribution Model, Version 2.0, with Special Attention to the San Francisco Bay Area: Cultural Resources Inventory of Caltrans District 4 Rural Conventional Highways
51085	2018	Ghost Towns of Yolo County, California

Source: Northwest Information Center (2025).

4.5.3.6 History

In California, the historic era is generally divided into three periods: the Spanish Period (1769 to 1821), the Mexican Period (1821 to 1848), and the American Period (1848 to present). Since there were no resources identified during the survey, this historic overview will focus on West Sacramento during the late Mexican Period and the American Period. Additional information regarding earlier history is available above in Section 4.5.3.4 and in Tribal Cultural Resources, Section 4.18.3.

City of West Sacramento. West Sacramento was first permanently settled by John Schwartz, a Flemish immigrant, in 1845. Schwartz established a small homestead along the west bank of the Sacramento River approximately six miles from its confluence with the American River. Schwartz established a salmon fishery nearby along with his brother George. The brothers also began raising livestock and growing potatoes and melons. Schwartz sold about 600 acres of his rancho to James McDowell in 1846. McDowell settled the area along with his wife and children and established what would become West Sacramento's Broderick neighborhood. McDowell was killed five years later in a barroom brawl, leaving his wife as the family's sole supporter. In an effort to collect revenue, Mrs. McDowell hired a land surveyor to map 160 acres of land and then subsequently divide the land into 41 street blocks. Mrs. McDowell sold the land, which eventually became the Town of Washington, a bustling community filled with shops, saloons, hotels, and restaurants that served as a rest stop for those traversing the marshlands on their way to Sacramento. The Town of Washington was later renamed Broderick in an effort to honor U.S. Senator David D. Broderick.[12]

As it flourished, West Sacramento's residential community expanded, more city blocks were added, and its boundaries stretched outwards. Fishing and farming became the two of the foremost

[12] Walters, Shipley. 1987. *West Sacramento: The Roots of a New City. Yolo County Historical Society, Woodland, California. Cited in Rahimi,* 2010. On file at LSA, Point Richmond, California.

enterprises during West Sacramento's early development period. The large numbers of salmon, sturgeon, catfish, eel, crayfish, and clams found in nearby rivers not only sustained the local markets but were also shipped in large quantities to San Francisco. The success of the fishing market was made possible by the establishment of the First Pacific Coast Salmon Cannery in 1864 by Andrew Hapgood and William and George Hume. The multimillion-dollar Pacific Coast salmon industry allowed the fish market to efficiently meet consumer demands and revolutionized the practice of fish preservation by replacing the use of salt with canning technology. The site of the First Pacific Coast Salmon Cannery was designated as a National Historic Landmark on April 6, 1964; however, the designation was withdrawn on July 14, 2004, when the area was developed into a park and the riverbank's appearance was altered significantly.[13]

4.5.4 Regulatory Setting

Federal, State, and local regulations and programs related to cultural resources that are applicable to the proposed project are described below.

4.5.4.1 Federal Regulations

The National Historic Preservation Act of 1966 (NHPA). The NHPA requires that the federal government list significant historic resources on the National Register. Federal agencies must consult the National Register when planning to undertake or grant approval through permits for a project. Prior to the issuance of any license or implementation of any project, the federal agency must consider the effects of a project or license on any historical buildings, sites, structures, or objects that are included on, or eligible for inclusion on, the National Register (16 United States Code [USC] Section 470(f)). This typically includes consultation with the federal agency responsible for the undertaking; the State Historic Preservation Officer (SHPO); local Native American groups and individuals; local and State historical societies and organizations; and relevant archival sources, including the appropriate facility of the California Historical Resources Information System (CHRIS).

4.5.4.2 State Regulations

California Register of Historical Resources (California Register) (Public Resources Code [PRC] Section 5020 et seq.). The California Register is used in the consideration of historical resources relative to significance for purposes of the California Environmental Quality Act (CEQA). The California Register includes California State Historical Landmarks; eligible Points of Historical Interest; and resources listed, or formally determined eligible for listing, in the National Register. Properties of local significance that have been designated under a local preservation ordinance (local landmarks or landmark districts), or that have been identified in a local historical resources inventory, may be eligible for listing in the California Register and are presumed to be significant resources for purposes of CEQA, unless a preponderance of evidence indicates otherwise.

[13] National Park Service (NPS). 2018. *First Pacific Coast Salmon Cannery Site. United States Department of the Interior, Washington, D.C*. Website: https://www.nps.gov/subjects/nationalhistoriclandmarks/first-pacific-coast-salmon-cannery-site.htm (accessed March 2026).

Generally, a resource is considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the California Register, consisting of the following:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;

2. It is associated with the lives of persons important to local, California, or national history;

3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values; or

4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

California Environmental Quality Act (CEQA). Pursuant to *State CEQA Guidelines* Section 15064.5(a), a "historical resource" includes, but is not limited to, any object, building, site, area, place, record, or manuscript that is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. CEQA mandates that lead agencies consider a resource "historically significant" if it meets the criteria for listing in the California Register, as described above. These criteria mimic those utilized to determine eligibility for the National Register.

Integrity is the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. Historical resources eligible for listing in the California Register must meet one of the criteria of significance described above and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance.

Historical resources other than potential Native American burials may be accidentally discovered during project construction.[14] As provided in *State CEQA Guidelines* Section 15064.5(f), provisions shall be made for historical or unique archaeological resources accidentally discovered during construction, including an immediate evaluation of the find by a qualified archaeologist. If the resource is determined to be historical or unique, contingency funding and sufficient time allotments to allow for implementation of avoidance measures or appropriate mitigation shall be available.

California PRC Section 5097.5. The PRC protects archaeological, paleontological, and historical sites and recognizes cultural and paleontological resources as nonrenewable, therefore granting them protection under the PRC and CEQA. Specifically, PRC Section 5097.5 provides for the protection of cultural resources and prohibits the removal, destruction, injury, or defacement of archaeological features on any lands under the jurisdiction of State or local authorities.

Assembly Bill 52 (AB) 52. Pursuant to AB 52,[15] Native American consultation is required upon request by a California Native American tribe that has previously requested that the City provide it

14 Public Resources Code Section 21083.2 and *State CEQA Guidelines* Section 15064.5(f).

15 Public Resources Code Section 21080.3.1.

with notice of such projects. The City provided notice of this proposed project to the tribes that had previously requested such notice, and consulted with California Native American tribes that requested consultation in response to the notice, pursuant to AB 52. Details regarding government-to-government consultation between the City and California Native American tribes are discussed in Section 4.18, Tribal Cultural Resources, of this EIR.

Senate Bill (SB) 18. Pursuant to SB 18, Native American consultation is required upon request by a California Native American tribe that has previously requested notice of proposed general plan or specific plan adoption or amendment, or land use policy actions, pursuant to Government Code Section 65352.3. The City provided notice of the proposed project and associated planning actions to California Native American tribes that had previously requested such notice. The City consulted with those tribes that requested consultation in response to the notice, consistent with the government-to-government consultation requirements of SB 18. Details regarding SB 18 consultation between the City and California Native American tribes are discussed in Section 4.18, Tribal Cultural Resources, of this EIR.

California Health and Safety Code (HSC). California HSC Section 7050.5 states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the Coroner of the county in which the remains are discovered has determined whether or not the remains are subject to the Coroner's authority. If the human remains are of Native American origin, the County of Yolo (County) Coroner must notify the NAHC within 24 hours of this identification. The NAHC will identify a Native American Most Likely Descendant (MLD) to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.

4.5.4.3 Regional Regulations

There are no regional regulations that apply to the proposed project with respect to cultural resources.

4.5.4.4 Local Regulations

City of West Sacramento General Plan. The Natural and Cultural Resources Element of the City's General Plan includes various goals and policies related to cultural resources. Goals, policies, and actions applicable to the proposed project include:

- **Goal RR-3 NCR-9:** To preserve and enhance West Sacramento's important historical, archaeological, and paleontological resources to increase awareness of the City's heritage.
    - **Policy NCR-9.1:** The City shall ensure the preservation of significant historical, archaeological, tribal cultural, and paleontological resources, including those recognized at the national, state, and local levels.
    - **Policy NCR-9.2**: The City shall consult with appropriate organizations and individuals early in the development process [e.g., Information Centers of the California Historical Resources Information System, the Native American Heritage Commission (NAHC); applicable Native

American tribes and/or individuals; and historical societies and organizations] to minimize impacts to cultural resources.

- **Policy NCR-9.5:** The City shall work with property owners to seek listing of significant historical resources on the California Register of Historical Resources and/or the National Register of Historic Places, where appropriate.

- **Policy NCR-9.6:** The City shall encourage the maintenance and preservation of historically- and architecturally-significant structures. Where such buildings cannot be preserved intact, the City shall encourage the preservation of character-defining features (e.g., building facades), where feasible.

- **Policy NCR-9.11:** The City shall require that new development near designated historical resources (e.g., buildings, structures, districts) is designed to be compatible with the character of the designated historic resource.

4.5.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the proposed project would have a significant adverse impact with respect to cultural resources if it would:

Threshold 4.5.1: Cause a substantial adverse change in the significance of a historical resource pursuant to *State CEQA Guidelines* Section 15064.5;

Threshold 4.5.2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to *State CEQA Guidelines* Section 15064.5; or

Threshold 4.5.3: Disturb any human remains, including those interred outside of formal cemeteries.

4.5.6 Project Impacts

Potential impacts to cultural resources are discussed below. Please refer to Section 4.5.9 for a full text description of the regulatory compliance and/or mitigation measures referenced in the analysis below.

Threshold 4.5.1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in *State CEQA Guidelines* Section 15064.5?

Less Than Significant with Mitigation Incorporated. For a cultural resource to be considered a historical resource (i.e., eligible for listing in the California Register), it generally must be 50 years or older. Under CEQA, historical resources can include precontact (i.e., Native American) archaeological deposits, historic-period archaeological deposits, historic buildings, and historic districts. A "substantial adverse change" to a historical resource, according to PRC Section 5020.1(q), "means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired."

As described above in Section 4.5.3, a records search of the project site and a 0.25-mile radius was conducted on April 28, 2025, through the NWIC. The results of the records search identified that one cultural resource had been documented within the project area (57-001628) and another two cultural resources have been documented within 0.25 mile of the project area (57-001628 and 57-000737). The NWIC indicated that no typical reports were produced within the project area; however, ten "other" reports were produced within the project area.

The records search and pedestrian field survey did not identify the presence of known cultural resources on or within the immediate vicinity of the project site. Additionally, all past built environment structures have been removed and the site remains undeveloped. Although the field survey did not identify any cultural resources within the project area, the designation of the eastern portion of the project area as a tribal cultural landscape in conjunction with known previously demolished historic buildings and agricultural use within the project area indicate an increased probability for surface and subsurface prehistoric and historic resources. Should archaeological deposits be encountered during project ground disturbance, a substantial adverse change in the significance of a historical resource would occur from its demolition, destruction, relocation, or alteration such that the significance of the resource would be materially impaired (*State CEQA Guidelines* Section 15064.5(b)(1)). Therefore, the proposed project would have a **potentially significant** impact to a historical resource. Accordingly, **Mitigation Measure CUL-1**, which requires the protection of known and unknown archaeological resources, and **Mitigation Measure TCR-1**, which requires a Workers Environmental Awareness Program (WEAP) and archaeological monitoring, would be required to be implemented to reduce the potentially significant impacts to historical resources to a **less than significant level**.

Threshold 4.5.2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to *State CEQA Guidelines* Section 15064.5?

Less Than Significant with Mitigation Incorporated. Pursuant to *State CEQA Guidelines* Section 15064.5(c)(1), "When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource." Those archaeological sites that do not qualify as historical resources shall be assessed to determine if they qualify as "unique archaeological resources" pursuant to California PRC Section 21083.2.

As discussed under Threshold 4.5.1 above, one previously recorded cultural resource (P-57-001628) is documented within the project site and extends into the surrounding area. An additional historic resource (P-57-000737), a 1911-era drainage canal, is located approximately 250 meters east of the site, but outside the project boundary. Additionally, although the field survey did not identify any cultural resources within the project area, the designation of the eastern portion of the project area as a tribal cultural landscape in conjunction with known historic buildings and agricultural use within the project area indicate an increased probability for surface and subsurface prehistoric and historic resources. Construction and ground-disturbing activities associated with the proposed project could reveal previously unknown subsurface archaeological resources, resulting in **potentially significant impacts** to archaeological resources if such resources are encountered.

Accordingly, if archaeological resources are discovered at any time during construction, the proposed project would be required to implement **Mitigation Measure CUL-1,** which requires the stoppage of

work in the vicinity of the find until the find can be assessed for significance by a qualified archaeologist. In addition, given the increased potential for subsurface prehistoric and tribal cultural resources within the project site, the proposed project would also be required to implement **Mitigation Measures TCR-1** and **TCR-2,** which provides for WEAP training prior to ground-disturbing activities, and archaeological monitoring during all ground-disturbing activities. With implementation of **Mitigation Measures CUL-1** and **Mitigation Measures TCR-1** and **TCR-2**, as identified in Section 4.18, Tribal Cultural Resources, potentially significant impacts to previously undiscovered archaeological and tribal cultural resources would be reduced to **less than significant with mitigation incorporated**.

Threshold 4.5.3: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. There are no known human remains on the project site. While fill will be imported to the project site to elevate the grade for consistency with the surrounding neighborhoods, construction facilitated by the proposed project would include ground-disturbing activities including grading and excavation. Ground-disturbing activity associated with project implementation has the potential to disturb previously unknown human remains

Accordingly, In the event that human remains are identified during ground-disturbing activities, the proposed project would be required to implement **Regulatory Compliance Measure CUL-1**, which requires that the identified remains be treated in accordance with Section 7050.5 of the HSC and PRC Section 5097.98. Section 7050.5 of the HSC states that, in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined whether or not the remains are subject to the coroner's authority. If the human remains are of Native American origin, the coroner must notify the NAHC within 24 hours of this identification. The NAHC will identify an MLD to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.

PRC Section 5097.98 states that the NAHC, upon notification of the discovery of Native American human remains pursuant to HSC Section 7050.5, shall immediately notify those persons it believes to be descended from the deceased (i.e., the Most Likely Descendant or "MLD"). With permission from the landowner or a designated representative, the MLD may inspect the remains and any associated cultural materials and make recommendations for treatment or disposition of the remains and associated grave goods. The MLD shall provide recommendations or preferences for treatment of the remains and associated cultural materials within 48 hours of being granted access to the site.

Development of the proposed project would be required to comply with the appropriate procedures required under State law, as detailed in **Regulatory Compliance Measure CUL-1,** for the treatment of human remains in order to ensure that descendant communities have significant input in the treatment and final disposition of human remains, if encountered at the project site during future development activities. Therefore, implementation of the proposed project would result in **less than significant** impacts related to human remains.

4.5.7 Cumulative Impacts

Less Than Significant with Mitigation Incorporated. As defined in Section 15355(b) of the *State CEQA Guidelines*, cumulative impacts refer to the incremental impacts of the project added to other closely related past, present, and reasonably foreseeable probable future projects. The cumulative study area for cultural resources is described in Chapter 4.0; the cumulative project list is provided in Chapter 4.0, **Table 4.A**, and a map of the cumulative project locations is provided in Chapter 4.0, **Figure 4-1**.

Potential impacts of the proposed project to unknown cultural resources, when combined with the impacts of past, present, and reasonably foreseeable projects, could contribute to a **potentially cumulatively significant** impact due to the overall loss of historical and archaeological resources unique to the area. As discussed above, there are no known cultural resources (including archaeological resources and human remains) with the required significance to be cultural resources under CEQA on the project site. Thus, the project would result in less than significant impacts on these known resources and would be less than cumulatively considerable in connection with the effects of past, current, and probable future projects in the City. In addition, compliance with **Regulatory Compliance Measure CUL-1** and implementation of **Mitigation Measure CUL-1** and **Mitigation Measures TCR-1** and **TCR-2,** as identified in Section 4.18, Tribal Cultural Resources, would reduce the potentially significant impacts to cultural resources, including any human remains and/or unanticipated resources discovered during the project, to a less than significant impact under CEQA. Additionally, although no cultural resources were identified within the project area, the designation of the eastern portion of the project area as a tribal cultural landscape in conjunction with known historic buildings and agricultural use within the project area indicate an increased probability for surface and subsurface prehistoric and historic resources resulting in a potentially significant impact. Accordingly, implementation of **Mitigation Measure TCR-1** would be required to reduce impacts to historic resources to a less than significant level. Therefore, the proposed project would not contribute to a cumulatively considerable impact on cultural resources, including human remains.

Each discretionary development proposal received by the city is required to comply with the requirements of CEQA, including an environmental review if applicable to determine if a project subject to CEQA would have a substantial adverse change in the significance of a cultural resource. If there is the potential for the proposed project to contribute to significant adverse impacts to archaeological or historical resources in conjunction with present or reasonably foreseeable projects in the City, an analysis of this project's contribution to the potentially significant adverse impact would be required to determine the nature and extent of the resources and identify appropriate mitigation measures. The mitigation measures included in this section would lessen any potential and significant cumulative impacts to archaeological resources by ensuring that proper oversight is provided in the event that any cultural or historical resource is uncovered during construction, and to ensure that adverse impacts to any cultural resources are reduced to less than significant levels. Therefore, when considered in conjunction with past, present, and probable future projects, project impacts pertaining to cultural resources, including human remains, would be less than cumulatively considerable with compliance with **Regulatory Compliance Measure CUL-1** and inclusion of **Mitigation Measure CUL-1** and **Mitigation Measures TCR-1** and **TCR-2,** as identified in Section 4.18, Tribal Cultural Resources.

4.5.8 Level of Significance Prior to Mitigation

Prior to mitigation, ground-disturbing activities could potentially result in significant impacts to unidentified archaeological resources, including both historic-era and prehistoric (Native American) resources, as well as to human remains.

4.5.9 Regulatory Compliance Measures and Mitigation Measures

4.5.9.1 Regulatory Compliance Measures

Regulatory Compliance Measure CUL-1 **Unanticipated Discovery of Human Remains.** If human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall take place until the Yolo County Coroner has made a determination of origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be Native American, the County Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD will have the opportunity to offer recommendations for the disposition of the remains.

4.5.9.2 Mitigation Measures

Mitigation Measure CUL-1 **Protection of Known and Unknown Archaeological Resources.** The following shall be implemented by the construction contractor during any ground-disturbing activities associated with project construction:

- In the event that unknown cultural deposits (e.g., sites, features, or artifacts) are encountered during project construction, all ground-disturbing activity within 100 feet of the resources shall immediately be halted and a qualified professional archaeologist (36 Code of Federal Regulations [CFR] 61) and appropriate Native American tribal representative shall be notified immediately and retained to assess the significance of the find. Construction activities could continue in other areas of the project Site.

- If the find is determined to be significant by the qualified archaeologist or Native American tribe (i.e., because it is determined to constitute either a historical resource or a unique

archaeological resource), the archaeologist shall develop appropriate procedures to protect the integrity of the resource and ensure that no additional resources are affected. Procedures could include, but would not necessarily be limited to, preservation in place, archival research, subsurface testing, or contiguous block unit excavation and data recovery.

- If the qualified archaeologist determines the archaeological material to be Native American in nature, the project proponent shall immediately contact the culturally affiliated Native American tribe for their input on the preferred treatment of the find.

In addition, implementation of **Mitigation Measures TCR-1** and **TCR-2** would also be required (refer to Section 4.18, Tribal Cultural Resources, of this Draft EIR).

4.5.10 Level of Significance after Mitigation

Implementation of **Mitigation Measure CUL-1** and **Mitigations Measures TCR-1** and **TCR-2,** as identified in Section 4.18 Tribal Cultural Resources, would reduce potential impacts to historic resources and unknown archaeological resources to a less than significant level. Additionally, with adherence to the regulatory standards in **Regulatory Compliance Measure CUL-1**, the project would result in less than significant impacts to previously undiscovered buried human remains. Therefore, potential significant impacts to cultural resources would be reduced to a less than significant level.

4.6 ENERGY

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for the Brar Farms Residential Development Project (proposed project) to impact energy from implementation of the proposed project in the City of West Sacramento (City). The section is based in part on using the Air *Quality, Greenhouse Gas, and Energy Impact Report* (Air Quality/GHG/Energy Analysis) that was prepared for the proposed project and is included in this Draft EIR as **Appendix B.**

4.6.1 Scoping Process

No comments related to energy were received during the public scoping period.

4.6.2 Methodology

The energy use analysis in this section is based on information from the California Emissions Estimator Model (CalEEMod version 2022.1 modeling results in the Air Quality/GHG/Energy Analysis), included in **Appendix B** of this Draft EIR. Operational fuel consumption (diesel fuel and gasoline) from vehicle trips was based on the trip generation estimates provided in Section 4.17, Transportation, vehicle emission factors from CalEEMod, and fuel efficiencies from the California Air Resources Board's (CARB) EMFAC2025 model for the operational year of 2027. Estimates of fuel consumption (diesel fuel and gasoline) from construction trucks and construction worker vehicles were based on trip estimates from CalEEMod and fuel efficiencies from the CARB's EMFAC2025 model.

The analysis focuses on the three sources of energy that are relevant to the proposed project: electricity, the equipment fuel necessary for project construction, and vehicle fuel necessary for project operations. To assist in the analysis and provide context, the amount of electricity, construction fuel, and fuel use from operations are quantified and compared to that consumed in Yolo County as a whole. The proposed project would be all electric, which was included in the CalEEMod assumptions. The electricity use of the proposed project is analyzed as a whole on an annual basis.

4.6.3 Existing Environmental Setting

4.6.3.1 Electricity

Electricity is a manmade resource. The production of electricity requires the consumption or conversion of energy resources (including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources) into energy. Electricity is used for a variety of purposes (e.g., lighting, heating, cooling, and refrigeration, and for operating appliances, computers, electronics, machinery, and public transportation systems).

According to the most recent data available, in 2024, California's electricity was generated primarily by natural gas (40.0 percent) and renewable sources (59.77 percent), including large hydroelectric and nuclear. Coal and other unspecified sources made up less than 1 percent.

Total electric generation in California in 2024 was 216,181 gigawatt-hours (GWh), down from the 2023 total generation of 281,140 GWh.[1]

The project site is within the service territory of Pacific Gas and Electric (PG&E) Company. According to the California Energy Commission (CEC), total electricity consumption in the PG&E service area in 2024 was 75,337 GWh (26,280 GWh for the residential sector).[2] Total electricity consumption in Yolo County in 2024 was 1,825 GWh (or 1,825,000,000 kilowatt-hours [kWh]).[3]

4.6.3.2 Fuel

Petroleum is also a non-renewable fossil fuel. Petroleum is a thick, flammable, yellow-to-black mixture of gaseous, liquid, and solid hydrocarbons that occurs naturally beneath the earth's surface. Petroleum is primarily recovered by oil drilling. It is refined into a large number of consumer products, primarily fuel oil, gasoline, and diesel.

Gasoline is the most used transportation fuel in California, with 97 percent of all gasoline being consumed by light-duty cars, pickup trucks, and sport utility vehicles. According to the most recent data available, in 2023, total gasoline consumption in California was 648,296 thousand barrels or 3,490.8 trillion British Thermal Units (BTU).[4] Of the total gasoline consumption, roughly 86 percent (555,413 thousand barrels or 2,974.0 trillion BTU) was consumed for transportation.[5] Based on fuel consumption rates obtained from CARB's Emissions Factor Model, Version 2025 (EMFAC2025), approximately 80.4 million gallons of gasoline and approximately 35.7 million gallons of diesel will be consumed from vehicle trips in Yolo County in 2025[6].

4.6.4 Regulatory Setting

Federal, State, and local regulations and programs related to energy that are applicable to the proposed project are described below.

4.6.4.1 Federal Regulations

On the federal level, the United States Department of Transportation (USDOT), the United States Department of Energy, and the United States Environmental Protection Agency (USEPA) are three federal agencies with substantial influence over energy policies and programs. Generally, federal

1 California Energy Commission (CEC). 2025. *2024 Total System Electric Generation*. Website: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2024-total-system-electric-generation (accessed May 2026).

2 California Energy Commission (CEC). *2024 Electricity Consumption.* Website: https://www.energy.ca.gov/data-reports/energy-almanac/ california-electricity-data/california-energy-consumption-dashboards-0 (accessed May 2026).

3 *Ibid.*

4 United States Energy Information Administration (EIA). 2023. California State Profile and Energy Estimates, Data. Website: https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_use_pa.html&sid=US&sid=CA (accessed May 2026).

5 *Ibid.*

6 California Air Resources Board (CARB). n.d. EMFAC Emissions Inventory. Website: https://arb.ca.gov/emfac/emissions-inventory/1ce2f46206362523da30b656d3fc5365ab81b8c9 (accessed May 2026).

agencies influence and regulate transportation energy consumption through establishment and enforcement of fuel economy standards for automobiles and light trucks, through funding of energy-related research and development projects, and through funding for transportation infrastructure improvements.

Energy Policy Act of 2005. The Energy Policy Act of 2005 seeks to reduce reliance on non-renewable energy resources and provides incentives to reduce current demand on these resources. For example, under this act, consumers and businesses can obtain federal tax credits for purchasing fuel-efficient appliances and products (including hybrid vehicles), building energy-efficient buildings, and improving the energy efficiency of commercial buildings. Additionally, tax credits are available for the installation of qualified fuel cells, stationary microturbine power plants, and solar power equipment.

Corporate Average Fuel Economy (CAFE) Standards. On March 31, 2022, the National Highway Traffic Safety Administration (NHTSA) finalized the CAFE standards for Model Years 2024–2026 Passenger Cars and Light Trucks. The amended CAFE standards would require an industry-wide fleet average of approximately 49 miles per gallon (mpg) for passenger cars and light trucks in model year 2026, by increasing fuel efficiency by 8 percent annually for model years 2024–2025, and 10 percent annually for model year 2026. The final standards are estimated to save about 234 billion gallons of gas between model years 2030 to 2050.

4.6.4.2 State Regulations

On the State level, the California Public Utilities Commission (CPUC) and the California Energy Commission (CEC) are two agencies with authority over different aspects of energy. The CPUC regulates privately owned electric, natural gas, telecommunications, water, railroad, rail transit, and passenger transportation companies and serves the public interest by protecting consumers and ensuring the provision of safe, reliable utility service and infrastructure at reasonable rates, with a commitment to environmental enhancement and a healthy California economy.

The CEC is the State's primary energy policy and planning agency. The CEC forecasts future energy needs, promotes energy efficiency, supports energy research, develops renewable energy resources, and plans for/directs state response to energy emergencies.

Assembly Bill 1575, Warren-Alquist Act. In 1975, largely in response to the oil crisis of the 1970s, the State Legislature adopted Assembly Bill (AB) 1575 (also known as the Warren-Alquist Act), which created the CEC. The statutory mission of the CEC is to forecast future energy needs; license power plants of 50 megawatts (MW) or larger; develop energy technologies and renewable energy resources; plan for and direct State responses to energy emergencies; and, perhaps most importantly, promote energy efficiency through the adoption and enforcement of appliance and building energy efficiency standards. AB 1575 also amended Public Resources Code (PRC) Section 21100(b)(3) and *State CEQA Guidelines* Section 15126.4 to require Environmental Impact Reports (EIRs) to include, where relevant, mitigation measures (MMs) proposed to minimize the wasteful, inefficient, and unnecessary consumption of energy caused by a project. Thereafter, the State Resources Agency created Appendix F to the *State CEQA Guidelines*. Appendix F assists EIR preparers in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. Appendix F of the *State CEQA Guidelines* also states that the goal of

conserving energy implies the wise and efficient use of energy and the means of achieving this goal, including (1) decreasing overall per capita energy consumption; (2) decreasing reliance on fossil fuels such as coal, natural gas, and oil; and (3) increasing reliance on renewable energy sources.

Senate Bill 1389, Energy: Planning and Forecasting. In 2002, the State Legislature passed Senate Bill (SB) 1389, which required the CEC to develop an integrated energy plan every 2 years for electricity, natural gas, and transportation fuels for the California Energy Policy Report. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero emission vehicles (ZEVs) and their infrastructure needs, and encouragement of urban designs that reduce vehicle miles traveled (VMT) and accommodate pedestrian and bicycle access.

In compliance with the requirements of SB 1389, the CEC adopts an Integrated Energy Policy Report every 2 years and an update every other year. The most recently adopted report includes the *2025 Integrated Energy Policy Report*[7] The *Integrated Energy Policy Report* covers a broad range of topics, including decarbonizing buildings, integrating renewables, energy efficiency, energy equity, integrating renewable energy, updates on Southern California electricity reliability, climate adaptation activities for the energy sector, natural gas assessment, transportation energy demand forecast, and the California Energy Demand Forecast. The *Integrated Energy Policy Report* provides the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the State is to meet its climate, energy, air quality, and other environmental goals while maintaining energy reliability and controlling costs.

Renewable Portfolio Standard. SB 1078 established the California Renewable Portfolio Standards program in 2002. SB 1078 initially required that 20 percent of electricity retail sales be served by renewable resources by 2017; however, this standard has become more stringent over time. In 2006, SB 107 accelerated the standard by requiring that the 20 percent mandate be met by 2010. In April 2011, SB 2 required that 33 percent of electricity retail sales be served by renewable resources by 2020. In 2015, SB 350 established tiered increases to the Renewable Portfolio Standards of 40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. In 2018, SB 100 increased the requirement to 60 percent by 2030 and required that all the State's electricity come from carbon-free resources by 2045. SB 100 took effect on January 1, 2019.[8]

California Energy Code. Energy consumption by new buildings in California is regulated by the Building Energy Efficiency Standards in Part 6 of Title 24 of the California Code of Regulations (CCR), known as the Energy Code. The CEC first adopted the Building Energy Efficiency Standards for Residential and Non-residential Buildings in 1978 in response to a legislative mandate to reduce energy consumption in the State. The Energy Code is updated every 3 years, with the most recent

7 California Energy Commission (CEC). *2025 Integrated Energy Policy Report*. California Energy Commission. Docket Number: 25-IEPR-01.

8 California Public Utilities Commission (CPUC). 2019. Renewables Portfolio Standard Program. Website: cpuc.ca.gov/rps (accessed May 2026).

update consisting of the 2025 Energy Code that became effective January 1, 2026.[9] Mid-cycle supplements to the 2025 Energy Code will become effective on July 1, 2027. The efficiency standards apply to both new construction and rehabilitation of both residential and nonresidential buildings, and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. The building efficiency standards are enforced through the local building permit process. Local government agencies may adopt and enforce energy standards for new buildings, provided these standards meet or exceed those provided in the Energy Code.

California Green Building Standards Code. In 2010, the California Building Standards Commission adopted Part 11 of the Title 24 Building Energy Efficiency Standards, referred to as the California Green Building Standards Code (CALGreen Code). The CALGreen Code took effect on January 1, 2011. The CALGreen Code is updated on a regular basis, with the most recent update consisting of the 2022 CALGreen Code standards that became effective January 1, 2023. The CALGreen Code established mandatory measures for residential and nonresidential building construction and encouraged sustainable construction practices in the following five categories: (1) planning and design, (2) energy efficiency, (3) water efficiency and conservation, (4) material conservation and resource efficiency, and (5) indoor environmental quality. Although the CALGreen Code was adopted as part of the State's efforts to reduce GHG emissions, the CALGreen Code standards have co-benefits of reducing energy consumption from residential and nonresidential buildings subject to the standard.

California Energy Efficiency Strategic Plan. On September 18, 2008, the CPUC adopted California's first Long-Term Energy Efficiency Strategic Plan, presenting a roadmap for energy efficiency in California. The Plan articulates a long-term vision and goals for each economic sector and identifies specific near-term, mid-term, and long-term strategies to assist in achieving those goals. The Plan also reiterates the following four specific programmatic goals known as the "Big Bold Energy Efficiency Strategies" that were established by the CPUC in Decisions D.07-10-032 and D.07-12-051:

- All new residential construction will be zero net energy (ZNE) by 2020.
- All new commercial construction will be ZNE by 2030.
- 50 percent of commercial buildings will be retrofitted to ZNE by 2030.
- 50 percent of new major renovations of State buildings will be ZNE by 2025.

4.6.4.3 Regional Regulations

SACOG's Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). As discussed in Section 4.3 Air Quality, the Sacramento Area Council of Governments (SACOG) adopted the 2025 Blueprint growth projections for population, employment, and households in the region in 2022. On November 20, 2025, SACOG adopted the MTP/SCS to the final 2025 Blueprint Plan.[10] The 2025 Blueprint is a 20-year transportation plan that address all modes of transportation and is

[9] California Energy Commission (CEC). *2025. Building Energy Efficiency Standards*. Website: https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2025-building-energy-efficiency (accessed July 2026).

[10] Sacramento Area Council of Governments (SACOG). 2022. *2025 Blueprint.* Website: https://www.sacog.org/planning/2025-blueprint/2025-blueprint-plan (accessed June 2026).

financially feasible, achieves health standards for clean air, and meets statewide climate goals. The 2025 Blueprint Plan indirectly addresses energy by guiding regional growth through a coordinated approach to transportation and development, encouraging more efficient travel behavior, improved transit access, and greater opportunities for walking and bicycling. By reducing VMT and supporting a multimodal transportation network, the MTP/SCS helps decrease regional energy demand associated with transportation.

4.6.4.4 Local Regulations

City of West Sacramento General Plan 2035. The Natural and Cultural Resources Element of the City's General Plan includes various goals and policies related to energy. Goals, policies, and actions applicable to the proposed project include:

- **Goal NCR-6:** To increase efficiency and conservation of resources in City facilities and operations to serve as a leader in sustainability.
    - **Policy NCR-6.1:** The City shall strive to achieve a 20 percent energy reduction in older municipal buildings through energy efficiency retrofits (e.g., LED light bulbs, low flow toilets and faucets, photovoltaic cells, bi-level and motion-activated lighting, computerized heating, ventilation, and air conditioning [HVAC] systems).
    - **Policy NCR-6.2:** The City shall build all new municipal buildings to be energy efficient as required in the California Building Code or higher.
    - **Policy NCR-6.6:** The City shall update and replace infrastructure, public facilities, and equipment with technologies that improve energy efficiency and conserve energy, where feasible.
    - **Policy NCR-6.7:** The City shall replace existing street lights with light emitting diode (LED) street lights, as financially feasible.
- **Goal NCR-7:** To increase energy independence and reduce greenhouse gas emissions through the use of renewable energy sources and improved energy conservation and efficiency.
    - **Policy NCR-7.1:** The City shall maintain and implement green building and energy efficiency standards for new development and redevelopment projects.
    - **Policy NCR-7.2:** The City shall provide incentives for green building practices and strive to remove barriers that impede their uses.
    - **Policy NCR-7.4:** The City shall require, to the extent feasible, site and building design that reduces exterior heat gain and heat island effects (e.g., tree planting, reflective paving materials, covered parking, cool roofs).
    - **Policy NCR-7.5:** The City shall require, to the extent feasible, building orientations and landscaping that use natural lighting to reduce energy demands.

- **Policy NCR-7.6:** The City shall require, to the extent feasible, new development to include renewable energy generation and co-generation facilities.

- **Policy NCR-7.7:** The City shall encourage the use of "EPA Energy Star" certified appliances (e.g., water heaters, swimming pool heaters, cooking equipment, refrigerators, furnaces and boiler units) for new private development and public facilities.

City of West Sacramento Climate Action and Adaption Plan (CAAP). The City's CAAP was adopted by the City Council on June 4, 2025.[11] The Final CAAP includes policies and strategies to reduce community and municipal GHG emissions. It builds upon the City's long-term planning vision for the future established in the City's 2035 General Plan, was designed with solutions tailored to the City's emission portfolio. The CAAP identifies seven overarching goals. The following goals address energy and apply to the proposed project:

- **Goal 3: Zero Carbon Power**

  - **Action 11:** Enhance utility coordination and advocate for the City's utility provider to provide access to carbon-free electricity and additional building efficiency/retrofit rebates and funding.

  - **Action 12:** Incentivize local solar photovoltaic systems and enhanced energy storage, and promote participation in community solar programs.

- **Goal 4: All-Electric Buildings**

  - **Action 13:** Develop and adopt a building electrification program and incentives for existing buildings

  - **Action 14:** Establish energy performance standards and GHG emissions limits for existing commercial buildings

  - **Action 15:** Mandate all-electric new construction in a phased approach to eliminate on-site fossil fuel use

  - **Action 16:** Create a home energy audit program and minimum efficiency thresholds

4.6.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the proposed project would have a significant adverse impact with respect to energy if it would:

[11] City of West Sacramento. 2025. *Climate Action and Adaptation Plan*. Website: https://www.cityofwestsacramento.org/government/departments/community-development/planning-division/climate-action-plan (accessed July 2026).

Threshold 4.6.1: Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or

Threshold 4.6.2: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

4.6.6 Project Impacts

Threshold 4.6.1: Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. Implementation of the project would increase the demand for energy through day-to-day operations and fuel consumption associated with project construction. This section discusses energy use resulting from implementation of the proposed project and evaluates whether the proposed project would result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with any applicable plans for renewable energy and energy efficiency.

Construction. For purposes of this EIR, this analysis assumes that construction of the proposed project is anticipated to begin in 2027 or 2028 and would commence within 12 or 18 months of project approval. This assumption provides a conservative basis for evaluating potential environmental impacts because earlier construction years typically reflect higher emissions and energy demand. Although construction could occur later than assumed, using a conservative start year ensures the analysis does not understate potential impacts. Energy would be required for activities such as the manufacture and transportation of building materials, grading, and building construction. The construction-related equipment would not be powered by natural gas, and no natural gas demand is anticipated during construction.

Transportation energy represents the largest energy use during construction and would occur from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction worker vehicles that would use petroleum fuels (e.g., diesel fuel and/or gasoline). Therefore, the analysis of energy use during construction focuses on fuel consumption. Construction trucks and vendor trucks hauling materials to and from the project site would be anticipated to use diesel fuel, whereas construction workers traveling to and from the project site would be anticipated to use gasoline-powered vehicles. Fuel consumption from transportation uses depends on the type and number of trips, VMT, the fuel efficiency of the vehicles, and the travel mode.

Estimates of diesel and gasoline consumption from construction equipment, hauling trucks for fill import, and worker vehicles were developed using CalEEMod default assumptions and fuel efficiency data from EMFAC2025. Estimated fuel use is presented in **Table 4.6.A: Energy Consumption Estimates During Construction**.

Table 4.6.A: Energy Consumption Estimates During Construction

Energy Type	Total Energy Consumption	Percentage Increase Countywide in 2026
Total Fuel Consumption		
Diesel Fuel (total gallons)	140,590.0	-
Gasoline (total gallons)	32,508.7	-
Annual Fuel Consumption		
Diesel Fuel (total gallons)	93,726.7	0.3
Gasoline (total gallons)	21,672.5	<0.1

Source: Compiled by LSA (May 2026).

As shown in **Table 4.6.A**, the project would consume approximately 140,590.0 gallons of diesel fuel and approximately 32,508.7 gallons of gasoline during the construction period. Construction of the proposed project is anticipated to occur for 18 months; when averaged over the 18-month construction period (1.5 years), the proposed project is estimated to consume approximately 93,726.7 gallons of diesel fuel and approximately 21,672.5 gallons of gasoline per year. Based on fuel consumption obtained from EMFAC2025, approximately 74.7 million gallons of gasoline and approximately 34.7 million gallons of diesel will be consumed from vehicle trips in Yolo County in 2027. Therefore, the proposed project would increase the annual construction-generated fuel use in Yolo County by approximately 0.3 percent for diesel fuel usage and by approximately less than 0.1 percent for gasoline fuel usage. Accordingly, project construction would have a negligible effect on local and regional energy supplies. Furthermore, impacts related to energy use during construction would be temporary and relatively small in comparison to Yolo County's overall use of the State's available energy resources. No unusual project characteristics would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in the region or the State. In addition, construction activities are not anticipated to result in an inefficient use of energy because gasoline and diesel fuel would be supplied by construction contractors who generally are incentivized for efficient fuel use to minimize their costs on the project. Additionally, the proposed project would also be required to adhere to all federal, State, and local requirements such as Off-Road Diesel Regulations. Off-Road Diesel Regulations include limits to idling to five consecutive minutes, a written Idling policy for medium to large fleets, and requires contracting entities to obtain valid Certificates of Reported Compliance for all listed contractors and subcontractors for contract work where vehicles subject to Off-Road Regulation will operate.[12] While the purpose of this regulation is to reduce the PM and NO_x emissions from in-use off-road heavy duty vehicles in California, these limits also reduce inefficient, wasteful, and unnecessary fuel consumption by limiting idling. The proposed project would not cause or result in the need for additional energy facilities or an additional or expanded delivery system. For these reasons, fuel consumption during construction of the proposed project would not be inefficient, wasteful, or unnecessary. Impacts would be less than significant, and no mitigation is required.

12 California Air Resources Board (CARB). 2026. *In-Use Off-Road Diesel-Fueled Fleets Regulations.* Website: https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation/about (accessed July 2026).

Operation. Operational energy use is typically associated with electricity, natural gas, and fuel for vehicle trips. As stated above, the proposed project would be designed and operated as an all-electric development. Therefore, no energy use associated with natural gas would occur. Energy consumption for the proposed project was estimated using CalEEMod default energy intensities by land-use type.

The proposed project would also result in energy usage associated with gasoline and diesel fuel consumed by project-related vehicle and truck trips. Fuel use associated with vehicle and truck trips generated by the proposed project were calculated based on the project's trip generation, which identifies that the proposed project would generate approximately 2,422 daily trips. The amount of operational fuel use was estimated using CARB's EMFAC2025 model, which provided projections for typical daily fuel usage in Yolo County.

Electricity and fuel usage estimates associated with operation of the proposed project are shown in **Table 4.6.B: Energy Consumption Estimates During Operation**.

Table 4.6.B: Energy Consumption Estimates During Operation

Energy Type	Annual Energy Consumption
Electricity Consumption (kWh/year)	4,416,340.0
Gasoline (gallons/year)	469,540.7
Diesel Fuel (gallons/year)	65,028.3

Source: Compiled by LSA (May 2026).
kWh = kilowatt-hours

As shown above in **Table 4.6.B**, the estimated potential increase in electricity demand associated with the operation of the proposed project is 4,416,340 kWh per year. Total electricity consumption in Yolo County in 2024 was 1,825 GWh (or 1,825,000,000 kWh). Therefore, operation of the proposed project would increase the annual electricity consumption in Yolo County by approximately 0.2 percent.

Electrical demand associated with project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. Furthermore, the proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. The proposed project would also be required to adhere to all federal, State, and local requirements for energy efficiency, including the Title 24 standards. Title 24 establishes minimum energy performance requirements for building envelope design, lighting, mechanical systems, water heating systems, and other building components, and is periodically updated to improve energy efficiency and reduce energy consumption. Compliance with the current Title 24 standards demonstrates that the project would be designed and constructed to meet established State energy-efficiency benchmarks. In addition, he proposed residential units would incorporate energy efficient design features, such as passive solar heating and cooling, natural ventilation, energy-efficient windows, solar roofs, green roofs, or cool roof systems, and energy-efficient home

appliances, which would further reduce energy usage. The proposed project would also be designed to be all-electric and will not include the use of natural gas.

As also shown in **Table 4.6.B**, the increase in fuel use associated with the vehicle trips generated by the proposed project is estimated at 469,540.7 gallons of gasoline and 65,028.3 gallons of diesel fuel per year. This analysis conservatively assumes that all vehicle trips generated as a result of project operation would be new to Yolo County. Based on fuel consumption obtained from EMFAC2025, approximately 77.8 million gallons of gasoline and approximately 34.4 million gallons of diesel will be consumed from vehicle trips in Yolo County in 2028. Therefore, vehicle and truck trips associated with the proposed project would increase the annual fuel use in Yolo County by 0.6 percent for gasoline fuel usage and by approximately 0.2 percent for diesel fuel usage. In addition, the proposed project would also be designed to support alternative modes of transportation by including open space and pedestrian infrastructure which would improve street connectivity. Therefore, the proposed project would promote overall mobility within the project site. Therefore, fuel consumption associated with vehicle trips generated by the proposed project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. Impacts would be **less than significant**, and no mitigation is required.

Threshold 4.6.2: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. In 2002, the Legislature passed SB 1389, which required the CEC to develop an integrated energy plan every 2 years for electricity, natural gas, and transportation fuels for the Integrated Energy Policy Report. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for ZEVs and their infrastructure needs, and encouragement of urban designs that reduce VMT and accommodate pedestrian and bicycle access.

The CEC's *2025 Integrated Energy Policy Report* provides the results of the CEC's assessments of a variety of energy issues facing California. As indicated above, energy usage during construction of the proposed project would be temporary in nature and relatively small in comparison to the overall use in Yolo County. In addition, energy usage associated with operation of the proposed project would be relatively small in comparison to the overall use in Yolo County, and the State's available energy resources. Therefore, energy impacts at the regional level would be negligible. Because California's energy conservation planning actions are conducted at a regional level, and because the proposed project's total impact on regional energy supplies would be minor, the proposed project would not conflict with or obstruct California's energy conservation plans as described in the CEC's Integrated Energy Policy Report. Additionally, as demonstrated above, the proposed project would not result in the inefficient, wasteful, and unnecessary consumption of energy. Potential impacts related to conflict with or obstruction of a State or local plan for renewable energy or energy efficiency would be **less than significant**, and no mitigation is required.

4.6.7 Cumulative Impacts

Less Than Significant Impact. As defined in Section 15130 of the *State CEQA Guidelines*, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area.

The geographic area for cumulative analysis of electricity and natural is within the PG&E service area. Although the proposed Project would result in a net increase in demand for electricity, this increase would be negligible in the context of countywide and regional electricity use and would be consistent with planned growth anticipated by the existing utility service providers. As discussed in Section 4.6.3.1, total electricity consumption in the PG&E service area in 2024 was approximately 75,337 GWh, including 26,280 GWh for the residential sector. Total electricity consumption in Yolo County in 2024 was 1,825 GWh (1,825,000,000). Operation of the proposed project would increase annual electricity demand by approximately 4,416,340 kWh per year, or 0.2 percent of total countywide electricity consumption.

While total electricity demand in the PG&E service area and Yolo County is expected to increase as new development occurs, this increase is accounted for in PG&E's long-term system-wide energy planning[13] and the CEC's statewide demand forecasts.[14] As discussed above, the proposed project's annual electricity demand would represent only a small fraction of countywide electricity consumption (approximately 0.2 percent). Accordingly, the proposed project's incremental demand would constitute a negligible portion of electricity consumption within the PG&E's service area and would not be expected to result in substantial energy-related environmental impacts. In addition, the proposed project's share of cumulative electricity consumption would be negligible. In addition, the proposed Project is required to comply with various federal and State government legislation to improve energy efficiency in buildings, equipment, and appliances, which would help to reduce electricity consumption associated with the proposed project. Therefore, the proposed project's contribution to impacts related to the inefficient, wasteful, and unnecessary consumption of electricity would not be cumulatively considerable.

Similarly, additional natural gas infrastructure is not anticipated due to cumulative development. In 2024, total natural gas consumption in the PG&E service area was 4,225 million therms, including 1,705 million therms used by the residential sector. Total natural gas consumption in Yolo County in 2024 was 59.6 million therms. As stated above, the proposed project would be designed to be all electric and no natural gas use is anticipated for operations of the proposed project. Therefore, the proposed Project's contribution to impacts related to the inefficient, wasteful, and unnecessary consumption of natural gas would not be cumulatively considerable.

The proposed project would also result in energy usage associated with gasoline and diesel fuel consumed by project-related vehicle trips. As shown above in **Table 4.6.B**, fuel use associated with

[13] Pacific Gas & Electric Company (PG&E). n.d. Integrated Resource Planning. Website: https://www.pge.com/en/about/doing-business-with-pge/integrated-resource-planning.html (accessed July 2026).

[14] California Energy Commission (CEC). *2025 Integrated Energy Policy Report*. California Energy Commission. Docket Number: 25-IEPR-01.

vehicle and truck trips generated by the proposed project is estimated at 140,590.0 gallons of diesel fuel and approximately 32,508.7 gallons of gasoline during the construction period. When averaged over the 18-month construction period (1.5 years), the proposed project is estimated to consume approximately 93,726.7 gallons of diesel fuel and approximately 21,672.5 gallons of gasoline per year. Based on fuel consumption obtained from EMFAC2025, approximately 74.7 million gallons of gasoline and approximately 34.7 million gallons of diesel will be consumed from vehicle trips in Yolo County in 2027. Therefore, the proposed project would increase the annual construction-generated fuel use in Yolo County by approximately 0.3 percent for diesel fuel usage and by approximately less than 0.1 percent for gasoline fuel usage. Although transportation energy use would increase, this negligible increase in transportation energy use would not represent a major amount of energy use when compared to the amount of existing fuel consumption and total number of vehicle trips and VMT throughout Yolo County and the region. In addition, the proposed project would be designed to support alternative modes of transportation by including open space and pedestrian infrastructure which would improve street connectivity. Accordingly, the proposed project would promote overall mobility within the project site. Therefore, fuel consumption associated with vehicle trips generated by the proposed project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

Furthermore, the proposed project, in combination with other past, present, and potential future projects, would not result in inefficient, wasteful, and unnecessary consumption of energy. Therefore, the proposed project's contribution to impacts related to the inefficient, wasteful, and unnecessary consumption of energy would not be cumulatively considerable, and this impact would be **less than significant**. No mitigation is required.

4.6.8 Level of Significance Prior to Mitigation

The proposed project would result in less than significant impacts related to energy.

4.6.9 Regulatory Compliance Measures and Mitigation Measures

4.6.9.1 Regulatory Compliance Measures

There are no regulatory compliance measures applicable to the proposed project pertaining to energy.

4.6.9.2 Mitigation Measures

The proposed project would not result in significant impacts related to energy, and no mitigation is required.

4.6.10 Level of Significance after Mitigation

The proposed project would result in less than significant impacts related to energy.

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4.7 GEOLOGY AND SOILS

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for the proposed Brar Farms Residential Development Project (proposed project) to impact geology and soils in the City of West Sacramento (City). This section is based in part on the Geotechnical Engineering Report[1] provided in **Appendix E-1**, and the Supplemental Geotechnical Recommendations,[2] provided in **Appendix E-2** of this Draft EIR. This section also incorporates information provided in the City's General Plan, Southport Framework Plan, applicable provisions of the City's Municipal Code, applicable State and federal studies of geologic and seismic hazards in the vicinity of West Sacramento, and site-specific investigations in the project area.

4.7.1 Scoping Process

Several comments received during the scoping period addressed geology and soils. These comments raised concerns related to the proposed project's potential effects on ground subsidence associated with dewatering. In addition, a comment letter identified the presence of a previously abandoned oil/gas well on the project site.

4.7.2 Methodology

The analysis of potential geologic and soil-related impacts is based on the site-specific Geotechnical Engineering Report completed for the proposed project. The Geotechnical Engineering Report included a site reconnaissance, subsurface exploration, collection of soils, geotechnical engineering analysis, and review of historical aerial photographs and available groundwater information. The City's General Plan and information from State agencies was referenced to establish the existing on-site geologic conditions. In determining the level of significance, the analysis assumes that construction and operation of the proposed project would comply with relevant State laws and regulations, as well as applicable City General Plan policies.

4.7.3 Existing Environmental Setting

The existing setting for geology and soils discussed below includes regional geology, faulting and seismicity, soils, local geology and subsurface conditions, local groundwater conditions, geologic and seismic hazards, and paleontological resources.

4.7.3.1 Regional Geology

The City of West Sacramento is located in the southern portion of the Sacramento Valley, which forms the northern portion of California's Great Valley geomorphic province. The Great Valley, also called the Central Valley, is bounded by the Klamath Mountains to the north, Tehachapi Mountains to the south, the Sierra Nevada to the east, and the Coast Ranges to the west. The Great Valley is floored with sedimentary deposits ranging in age from Jurassic to Quaternary. The Central Valley is approximately 450 miles long and has an average width of 50 miles.

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1 Raney Geotechnical Inc. 2024. *Geotechnical Engineering Report, Brar Farms Subdivision. 3425 Marshall Road. West Sacramento, California*. October.

2 Raney Geotechnical Inc. 2025. *Supplemental Geotechnical Recommendations, Brar Farms Subdivision. 3425 Marshall Road. West Sacramento, California*. December.

4.7.3.2 Faulting and Seismicity

The project area is located in a region of California with relatively low seismic activity. The region is not directly underlain by any major active faults. However, the Sacramento area is near significant faults including the San Andreas Fault and Hayward Fault located to the west. The nearest active Alquist-Priolo Earthquake Fault Zone is the Cordelia Fault, located approximately 37 miles west of West Sacramento.

4.7.3.3 Local Geology

According to the Cultural Resources Assessment prepared for the proposed project (**Appendix D)**, the project site was the previous location of H&H Nishimura Farms and was historically used for agricultural purposes. Below the disced soil, the project area as situated is mapped as Holocene basin deposits. Sediments in this unit are described as fine-grained sediments of late Holocene age with horizontal stratification deposited by standing or slow-moving water in topographic lows. In addition, according to the Geotechnical Engineering Report completed for the proposed project, the majority of the project site is underlain by brown, moist clay, and clay fill.

4.7.3.4 Subsurface Conditions and Soils

As part of the subsurface exploration conducted for the proposed project, 12 test pits were excavated to depths ranging from five to seven feet below ground surface. Soil conditions encountered at the test pit locations generally consisted of stiff to hard fat clay, which was found to extend through the full depth of exploration. One test pit, located in the northern end of the site, encountered three feet of lean clay fill underlain by similar native fat clay.

4.7.3.5 Oil, Gas, and Methane

The entirety of the project site is located within the now abandoned Greens Lake Gas Field. According to the California Department of Conservation's California Geologic Energy Management Division (CalGEM), one dry-hole oil and gas well (American Petroleum Institute [API] No. 0411320081, Nishimura 1) is located in the northeastern portion of the project site, approximately 80 feet south of Marshall Road. Per CalGEM records, the well spud date (i.e., the date the well was first drilled) was November 3, 1969. The well was ultimately drilled to a depth of 5,000 feet and was never put into production. Records indicate that the well, owned by Mobil Oil Exploration & Production North America, Inc., was plugged and abandoned on November 10, 1969. While records show that there are wells located to the southwest in the Bridgeway Lakes neighborhood and to the northwest, there are no other oil or gas wells identified within the project site.[3]

4.7.3.6 Local Groundwater Conditions

Free water was not encountered during the subsurface exploration, which extended to a maximum depth of seven feet. However, the Geotechnical Engineering Report reviewed available groundwater data from the California Department of Water Resources (DWR). Groundwater well data for State Well No. 08N04E18L001M, located approximately 0.15 mile west of the project site, indicated that the groundwater elevation ranges from approximately one to 11 feet below ground surface from

[3] California Geologic Energy Management Division (CalGEM). 2018. *WellStar. Well Detail.* Website: https://wellstar-public.conservation.ca.gov/Well/Well/Detail?api=0411320081 (accessed February 2026).

August of 1977 to April of 2006, consistent with findings in the Supplemental Geotechnical Recommendations (**Appendix E-2**).

4.7.3.7 Geologic and Seismic Hazards

Geologic and seismic hazards discussed in this subsection include the following:

- Surface rupture;
- Ground shaking;
- Liquefaction;
- Subsidence and seismic settlement;
- Landslides/slope stability; and
- Compressible, expansive, and collapsible soils.

Surface Rupture. Surface rupture occurs where displacement or fissuring occurs along a fault zone. Although primary ground damage due to earthquake fault rupture typically results in a relatively small percentage of the total damage in an earthquake, the location of structures or facilities too close to a rupturing fault can cause profound damage. It is difficult to reduce the hazards of surface rupture through structural design. The primary method to avoid this hazard is to either set structures and facilities away from active faults, or avoid their construction in close proximity to an active fault.

There are no active faults within or immediately adjacent to the project site based on review of reports and maps published by the California Geological Survey (CGS) and as identified in the Geotechnical Engineering Report.[4] Additionally, the project site is not located within an Alquist-Priolo Earthquake Fault Zone.

Ground Shaking. The vast majority of earthquake damage is caused by ground shaking. The extent of shaking is a result of the size of the earthquake and distance from the epicenter. The exact way rocks and other earth materials move along the fault can also influence shaking, as can the subsurface orientation of the fault.

There are numerous faults capable of producing significant ground motions in Yolo County further west of the city. According to the Geotechnical Engineering Report, there are relatively low levels of seismic shaking anticipated at the project site.

Liquefaction and Lateral Spreading. Liquefaction occurs primarily in saturated, loose, fine-to-medium-grained alluvial soils in areas where the groundwater table is within 50 feet of the surface. Shaking suddenly causes soils to lose strength and behave as a liquid. Liquefaction-related effects include loss of bearing strength, lateral spreading, and flow failures or slumping.

The project site was evaluated for liquefaction potential as part of the Geotechnical Investigation. Based on the results of subsurface exploration and known geologic, seismic, and soil conditions,

[4] California Geologic Energy Management Division (CalGEM). 2018. *WellStar. Well Detail.* Website: https://wellstar-public.conservation.ca.gov/Well/Well/Detail?api=0411320081 (accessed February 2026).

potential for liquefaction occurring at the project site during seismic events is low and does not need to be accounted for.

Subsidence and Seismic Settlement. Ground subsidence is typically a gradual settling or sinking of the ground surface with little or no horizontal movement, although fissures (cracks and separations) can result from lowering of the ground surface. The common causes of subsidence that can produce small or local collapses to broad regional subsidence include:

- Dewatering of peat or organic soils;
- Dissolution in limestone aquifers;
- First-time wetting of dry low-density soils (hydrocompaction);
- Natural compaction;
- Liquefaction;
- Crustal deformation;
- Ground shaking;
- Subterranean mining; and
- Withdrawal of fluids (groundwater, petroleum, or geothermal).

Most of the damage caused by subsidence is the result of oil, gas, or groundwater extraction from below the ground surface. Ground subsidence may occur as a response to natural forces such as earthquake movements, which can cause abrupt elevation changes of several feet or densification of low density granular soils during an earthquake event that may cause several inches of settlement. Historically, ground subsidence has been a concern in the Sacramento-San Joaquin Delta and San Joaquin Valley. According to the City's General Plan, the project site is not located in a portion of the County that has experienced or has the potential to experience ground subsidence.

Landslides/Slope Stability. Factors that contribute to slope failure include slope height and steepness, shear strength and orientation of weak layers in the underlying geologic units, and pore water pressures. According to the U.S. Landslide Inventory and Susceptibility Map, the potential for landslides to affect the project site is considered low.[5]

Expansive Soils. Expansive soils generally have a significant amount of clay particles that can give up water (shrink) or take on water (swell). The change in volume exerts stress on buildings and other loads placed on these soils. The extent of shrink/swell is influenced by the amount and kind of clay in the soil. The occurrence of these soils is often associated with geologic units having marginal stability. According to the Geotechnical Engineering Report, the site investigation completed for the proposed project identified that the soils on-site were found to have a moderate to very high expansion potential when tested in accordance with the American Society of Testing and Materials (ASTM) D4318 Standard Test Methods for Liquid Limit, Plastic Limit, and Plasticity Index of Soils.

[5] United States Geological Survey. 2026. U.S. Landslide Inventory and Susceptibility Map. Website: https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=ae120962f459434b8c904b456c82669d (accessed February 2026).

4.7.3.8 Paleontological Resources

There are no known unique geological features present on site. According to the Geotechnical Engineering Report, the project site is underlain by engineered fill soils and clay soils. While engineered fill soils may contain fossils, these fossils have been removed from their original location and are thus out of stratigraphic context. Therefore, they are not considered sensitive for paleontological resources. Hard, fat clay soils, however, are considered to be sensitive for paleontological resources.

4.7.4 Regulatory Setting

Federal, State, and local regulations and programs related to geology and soils that are applicable to the proposed project are described below.

4.7.4.1 Federal Regulations

Earthquake Hazards Reduction Act. The Earthquake Hazards Reduction Act was enacted in 1997 to "reduce the risks to life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards and reduction program." To accomplish this, the act established the National Earthquake Hazards Reduction Program (NEHRP). This program was significantly amended in November 1990 by the National Earthquake Hazards Reduction Program Act (NEHRPA), which refined the description of agency responsibilities, program goals, and objectives.

NEHRP's mission includes improved understanding, characterization, and prediction of hazards and vulnerabilities; improvement of building codes and land use practices; risk reduction through post-earthquake investigations and education; development and improvement of design and construction techniques; improvement of mitigation capacity; and accelerated application of research results. The NEHRPA designates the Federal Emergency Management Agency (FEMA) as the lead agency of the program and assigns it several planning, coordinating, and reporting responsibilities.

4.7.4.2 State Regulations

Alquist-Priolo Earthquake Fault Zoning Act (1972). The major State legislation regarding earthquake fault zones is the Alquist-Priolo Earthquake Fault Zoning Act (A-P Act), which was passed in 1972. Following passage of the A-P Act, the State of California began delineating "Earthquake Fault Zones" (called Special Studies Zones prior to 1994) around and along faults that are "sufficiently active" and "well defined" to reduce fault-rupture risks to structures for human occupancy.[6] The boundary of an "Earthquake Fault Zone" is generally 500 feet from major active faults and from 200 to 300 feet from well-defined minor faults. The mapping of active faults is conducted by the State Geologist, and these maps are distributed to all affected cities, counties, and State agencies for their use in developing planning policies and controlling renovation or new construction.

Before a project can be permitted within an identified Earthquake Fault Zone, cities and counties must require a geologic investigation to demonstrate that proposed buildings will not be constructed across active faults. A site-specific evaluation and written report must be prepared by a licensed

[6] California Public Resources Code Sections 2621–2630.

geologist. If an active fault is identified, a structure intended for human occupancy cannot be placed over the trace of the fault and must be set back from the fault a minimum of 50 feet.

The A-P Act only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards.

Seismic Hazard Mapping Act (1990). The Seismic Hazard Mapping Act (SHMA) was adopted by the State in 1990 to address the potential hazards posed by secondary effects of seismic activity, including strong ground shaking, soil liquefaction, and associated ground failure and seismically induced landslides. The CGS prepares and provides local governments with seismic hazard zone maps that identify areas susceptible to amplified shaking, liquefaction, earthquake-induced landslides, and other ground failures. The seismic hazard zones are referred to as "zones of required investigation" because site-specific geological investigations are required for construction projects located within these areas. Before a project can be permitted, a geologic investigation, evaluation, and written report must be prepared by a licensed geologist to demonstrate that the potential hazards can be successfully mitigated.

Natural Hazards Disclosure Act. Effective June 1, 1998, the Natural Hazards Disclosure Act requires that sellers of real property and their agents provide prospective buyers with a "Natural Hazard Disclosure Statement" when the property being sold lies within one or more State-mapped hazard areas. If a property is located in a Seismic Hazard Zone as shown on a map issued by the State Geologist, the seller or the seller's agent must disclose this fact to potential buyers.

California Building Code (CBC). Current law states that every local agency enforcing building regulations, such as cities and counties, must adopt the provisions of the CBC within 180 days of its publication. The publication date of the CBC is established by the California Building Standards Commission, and the code is also known as Title 24, Part 2, of the California Code of Regulations (CCR). Local jurisdictions often adopt local, more restrictive amendments that are based on local geographic, topographic, or climatic conditions. These codes provide minimum standards to protect property and public safety by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The CBC contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock on site, and the strength of ground shaking with a specified probability at a site.

Requirements for Geotechnical Investigations. Requirements for geotechnical investigations for subdivisions requiring tentative and final maps and for other types of structures are provided in HSC, Sections 17953 through 17955, and in Section 1802 of the CBC. Testing of samples from subsurface investigations is required, such as from borings or test pits. Studies must be done as needed to evaluate slope stability, soil strength, position and adequacy of load-bearing soils, the effect of moisture variation on load-bearing capacity, compressibility, liquefaction, differential settlement, and expansiveness.

California PRC Section 5097.5. Section 5097.5 of the PRC provides for the protection of cultural and paleontological resources and prohibits the removal, destruction, injury, or defacement of

archaeological and paleontological features on any lands under the jurisdiction of State or local authorities.

4.7.4.3 Local Regulations

City of West Sacramento Municipal Code, Chapter 15.12. Building and construction in the city are subject to the regulations of the City of West Sacramento Municipal Code. CCR, Title 24, Part 2, the CBC, provides minimum standards for building design in the State. Local codes are permitted to be more restrictive than Title 24, but not less restrictive. The procedures and limitations for the design of structures are based on site characteristics, occupancy type, configuration, structural system height, and seismic design category. The seismic ratings used in the CBC are derived from the International Building Code specifications. Chapter 15.12 of the City's Municipal Code includes the adoption of the CBC with additional amendments and addresses both building and grading standards.

City of West Sacramento General Plan 2035. The Safety Element of the City of West Sacramento General Plan 2035 contains the following applicable goals and policies related to geology and soils:

- **Goal S-3:** To prevent loss of life, injury, and property damage due to geologic and seismic hazards.
    - **Policy S-3.1:** The City shall require that new structures are able to withstand the effects of seismic activity, including liquefaction, within the limits of technical and economic feasibility.
    - **Policy S-3.2:** The City shall require new development seeking a discretionary permit to prepare a geotechnical report or other appropriate analysis, and incorporate appropriate mitigation measure to ensure new structures are able to withstand the effects of seismic activity, including liquefaction.

The Natural and Cultural Resources Element of the City of West Sacramento General Plan 2035 contains the following applicable goals, policies, and actions related to paleontological resources:

- **Goal NCR-9:** To preserve and enhance West Sacramento's important historical, archaeological, and paleontological resources to increase awareness of the City's heritage.
    - **Policy NCR-9.1:** The City shall ensure the preservation of significant historical, archaeological, tribal cultural, and paleontological resources, including those recognized at the national, state, and local levels.
    - **Policy NCR-9.15:** For development and infrastructure projects, the City shall endeavor to identify sensitive resources early in project design efforts to avoid (e.g., to allow preservation in place) or minimize impacts.

Southport Framework Plan. The Southport Framework Plan provides typical conditions of approval for vesting tentative subdivision maps and tentative subdivision maps. The Southport Framework Plan does not provide goals or policies related to geology and soils.

4.7.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the proposed project would have a significant adverse impact with respect to geology and soils if it would:

Threshold 4.7.1(i): Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42;

Threshold 4.7.1(ii): Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking;

Threshold 4.7.1(iii): Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction;

Threshold 4.7.1(iv): Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides;

Threshold 4.7.2: Result in substantial soil erosion or the loss of topsoil;

Threshold 4.7.3: Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse;

Threshold 4.7.4: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property;

Threshold 4.7.5: Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water; or

Threshold 4.7.6: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

4.7.6 Project Impacts

Potential impacts to geology and soils are discussed below. Refer to Section 4.7.9 for a full description of the regulatory compliance and/or mitigation measures referenced in the analysis below.

Threshold 4.7.1(i): Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. The nearest fault to the project site is the Willows Fault Zone, located approximately 12 miles to the east of the project site. The Willows Fault Zone has been mapped as pre-Quaternary in age and is not considered active.[7] The nearest Alquist-Priolo Earthquake Fault Zone to the project site is the Cordelia Fault Zone, located approximately 37 miles southwest of the project site.[8] Due to the distance of known active faults, development of the proposed project would not subject people or structures to hazards from surface rupture of a known active fault. Therefore, impacts related to adverse effects due to fault ruptures would be **less than significant**. No mitigation is required.

Threshold 4.7.1(ii): Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Less Than Significant with Mitigation Incorporated. As discussed above under Threshold 4.7.1(i) the project site is not located within an Alquist-Priolo Earthquake Fault zone. However, according to the Geotechnical Engineering Report prepared for the proposed project (see **Appendix E**), the project site is classified as Site Class D, which indicates moderate potential for amplified ground shaking. The intensity of ground shaking would depend on the characteristics of the triggered fault, distance from the fault, the magnitude and duration of the earthquake, and site-specific geologic conditions. Given the potential for moderate amplified ground shaking at the project site, the proposed project would have a **potentially significant impact** due to strong seismic ground shaking. Accordingly, the proposed project would be required to conform with the American Society of Civil Engineers (ASCE) 7-16 standard (Minimum Design Loads and Associated Criteria for Buildings and Other Structures), as well as meeting the seismic standards of the CBC and the City's Municipal Code. In addition, **Mitigation Measure GEO-1**, would require implementation of the design-level geotechnical evaluation recommendations, such as the use of post-tensioned slabs or mat foundations, proper subgrade preparation, and construction on engineered fill or moisture-conditioned soils. This would reduce potentially significant impacts resulting from strong seismic ground shaking to **less than significant with mitigation incorporated.**

[7] California Department of Conservation, 2015. *Fault Activity Map of California.* Website: https://maps.conservation.ca.gov/cgs/fam/ (accessed February 2026).

[8] California Department of Conservation. n.d. *Earthquake Zones of Required Investigation.* Website: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/ (accessed February 2026).

Threshold 4.7.1(iii): Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Less Than Significant Impact. The project site is located within an area designated by the State of California as having a very low potential for seismically induced liquefaction hazards. Based on the results of the subsurface explorations, (see **Appendix E**) the project site generally consists of stiff to hard fat clay extending to a depth of approximately five to seven feet below the ground surface. Groundwater was not encountered during explorations to depths of five to seven feet below ground surface. The Geotechnical Engineering Report reviewed groundwater data from the DWR. Groundwater well data for State Well No. 08N04E18L001M, located approximately 0.15 mile west of the project site, indicated that the groundwater elevation ranges from approximately one to 11 feet below ground surface at the well location, consistent with the findings of the Supplemental Geotechnical Recommendations provided in **Appendix E-2**. Excavation during construction of the proposed project is expected to extend to a maximum depth of 11 feet below ground surface. Excavation activities may encounter groundwater and groundwater dewatering may be required during project construction. However, as previously stated, the project site generally consists of firm to stiff cohesive soils with some medium to dense clayey sand layers. These soils are not susceptible to liquefaction. Therefore, the probability of liquefaction occurring at the site during a seismic event is low and project-related impacts associated with seismic-related ground failure, including liquefaction, would be **less than significant**. No mitigation is required.

Threshold 4.7.1(iv): Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

No Impact. According to the Geotechnical Engineering Report (see **Appendix E**), the topography of the site is relatively flat. Site elevations in feet above the North American Vertical Datum of 1988 (NAVD88) are estimated to range from approximately eight feet to 10 feet above mean sea level. An aerial drone survey conducted at the project site on October 25, 2024, indicated that surface elevations generally range from approximately nine to 13 feet above mean sea level, with the highest elevations occurring along the northern and eastern portions of the property. Additionally, the project site sits roughly three feet lower than the adjacent residential properties to the south, where an existing retaining wall separates the higher grade of that neighborhood from the existing project site.

Evidence of ancient landslides or slope instabilities were not observed at the project site. Additionally, according to the USGS Landslide Susceptibility Map, the potential for landslides to affect the project site is considered very low.[9] Both the project site and surrounding properties are generally flat with no unusual geographic features, and therefore, neither the project site nor the surrounding area has the potential for impacts related to landslides. Therefore, **no impact** would occur and no mitigation is required.

[9] United States Geological Survey. 2026. *U.S. Landslide Inventory and Susceptibility.* Website: https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=ae120962f459434b8c904b456c82669d (accessed February 2026).

Threshold 4.7.2: Would the project result in substantial soil erosion or the loss of topsoil?

***Less Than Significant Impact*.** During construction activities, the entirety of the approximately 60-acre project site would be subject to ground disturbance and grading activities which would expose soil and increase the potential for topsoil loss and erosion. In addition, drainage patterns would be temporarily altered during grading and other construction activities, which would also increase potential for soil erosion and siltation compared to existing conditions. Storm events could also result in soil erosion and siltation occurring at an accelerated rate. As discussed under Threshold 4.10.1 in Section 4.10, Hydrology and Water Quality, construction of the proposed project would disturb more than one acre of soil and would therefore be subject to the requirements of the State Water Resources Control Board's (SWRCB) Construction General Permit (CGP). Accordingly, the proposed project would be required to implement **Regulatory Compliance Measure WQ-1**, which requires the construction contractor to obtain coverage under the CGP and prepare a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP would detail Erosion Control and Sediment Control Best Management Practices (BMPs) to be implemented during construction to minimize erosion and retain sediment on site. With adherence to **Regulatory Compliance Measure WQ-1**, including implementation of construction BMPs, construction impacts related to on-site and off-site erosion or siltation would be **less than significant**, and no mitigation is required.

Upon completion of the project, the site would be developed with 259 residential lots, roadways, sidewalks, utility infrastructure, and approximately 6.65 acres of open space consisting of the Central Park, parklet, landscape lots, and the detention basin. For purposes of this analysis, the Drainage Study prepared for the proposed project in April 2026, assumed that approximately 55 percent of the proposed development area would be covered by residential units, walkways, roadways, and other paved surfaces. An increase in impervious surface area increases the rate and volume of runoff during a storm, which can more effectively transport sediments to receiving waters and result in loss of topsoil. However, the impervious surface areas on the project site would not be prone to on-site erosion or siltation because there would be no fully exposed soil. The remaining pervious surfaces on the project site would be landscaped with vegetation that would stabilize the soil and promote infiltration, thereby minimizing on-site erosion and siltation. Additionally, the proposed project would be required to implement **Regulatory Compliance Measure WQ-3**, which requires the preparation of a Final Post-Construction Standard Plan Worksheet in compliance with the Phase II (Municipal Separate Storm Sewer System) MS4 permit and the implementation of site design, source control, runoff reduction, storm water treatment, and low-impact development (LID) BMPs that minimize stormwater runoff thereby minimizing on-site erosion and siltation. With implementation of **Regulatory Compliance Measure WQ-3**, operational impacts related to soil erosion or loss of topsoil, would be **less than significant**, and no mitigation is required.

Threshold 4.7.3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant with Mitigation Incorporated. Impacts related to the potential for the project to be located on or to create unstable geologic units or soils, resulting in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse, are discussed below.

4.7.6.1 Landslides

No Impact. Landslides and other forms of mass wasting, including mud flows, debris flows, and soil slips, occur as soil moves downslope under the influence of gravity. Landslides are frequently triggered by intense rainfall or seismic shaking. Because the project site is in a generally level area, landslides or other forms of natural slope instability do not represent a significant hazard to the project site or the surrounding area. In addition, as discussed under Threshold 4.7.1(iv), the site is not within an area identified as being susceptible to landslides as both the project site and surrounding properties are flat with no unusual geographic features. Therefore, **no impact** related to landslides would occur, and no mitigation is required.

4.7.6.2 Lateral Spreading

No Impact. Lateral spreading often occurs on very gentle slopes or flat terrain. The dominant mode of movement is lateral extension accompanied by shear or tensile fracture. This failure is caused by liquefaction and is usually triggered by rapid ground motion, such as that experienced during an earthquake, but can also be artificially induced. When coherent material, either bedrock or soil, rests on materials that liquefy, the upper units may undergo fracturing and extension and may then subside, translate, rotate, disintegrate, or liquefy and flow. As discussed above under Threshold 4.7.1 (iii), the project site generally consists of firm to stiff cohesive soils with some medium to dense clayey sand layers, these soils are not susceptible to liquefaction. Given the low potential for liquefaction and lack of nearby open face areas, the project site possesses a low potential for lateral spreading. Therefore, **no impact** associated with lateral spreading and liquefaction would occur, and no mitigation is required.

4.7.6.3 Subsidence

Less Than Significant with Mitigation Incorporated. Subsidence is the gradual sinking of a large area of ground surface in which the material moves vertically downward, with little or no horizontal displacement. Subsidence can occur in several ways, including: (1) groundwater overdraft or oil and gas withdrawal, (2) compaction and oxidation of peat soils, and (3) hydrocompaction.

Land subsidence resulting from groundwater overdraft occurs when the extraction of groundwater compresses a clay bed within an aquifer to the point that it no longer fully expands to its original thickness after groundwater recharge. Clay beds often compress when wells pump groundwater and expand after pumping stops. Clay beds contain individual clay particles and small pores that fill with groundwater in saturated conditions. Groundwater maintains the pore space, expands the clay particles, and helps the bed maintain its thickness. A clay bed will yield a certain volume of groundwater (i.e., safe yield) without losing its storage capacity. If safe yield is not exceeded, the clay bed will compress and expand as the soil pores alternately fill with water and drain. This can lead to elastic land subsidence at the ground surface where elevation decreases when water is extracted then increases when water is recharged. If the safe yield of a clay bed is exceeded, however, its pores

collapse, and the surrounding clay particles settle in their place. When the clay particles settle, the clay bed is effectively thinned, resulting in permanent land subsidence at the ground surface.[10]

As stated in the Draft EIR for the City's General Plan,[11] various areas of the Central Valley, particularly the San Joaquin Valley and the San Joaquin–Sacramento River Delta, have experienced subsidence. Historical investigations in the Sacramento Valley indicate that subsidence has occurred where intensive groundwater pumping caused long-term water-level declines. Available leveling and water-level data suggest that approximately 0.2 to 0.9 feet of subsidence occurred between 1935 and 1964 across an agricultural pumping area between Zamora and Davis, with up to two feet measured in areas of severe overdraft.[12] Recent monitoring and mapping conducted by the California DWR have identified several localized "pockets" in the Sacramento Valley where measurable subsidence and early indications of sustainable-yield exceedance have occurred in recent years.[13] However, according to the Yolo County Multi-Jurisdictional Hazard Mitigation Plan, the potential for land subsidence in the city and surrounding area is negligible. Additionally, as detailed in the Geotechnical Engineering Report, the project site generally consists of stiff to hard fat clay extending to a depth of approximately five to seven feet below the ground surface (see **Appendix E**). However, one test pit located in the northern portion of the site encountered approximately three feet of undocumented lean clay fill underlain by native fat clay, indicating localized areas of non-engineered fill. Laboratory testing of these near-surface clay soils collected from the test pit locations indicated that these soils exhibit high plasticity and moderate to very high expansion potential.

While the subsurface exploration encountered no groundwater at depths of five to seven feet, the Geotechnical Engineering Report documented available groundwater data from the DWR. Groundwater well data for State Well No. 08N04E18L001M, located approximately 0.15 mile west of the project site, indicated that the groundwater elevation ranges from approximately one to 11 feet below ground surface at the well location. Excavation during construction of the proposed project is expected to extend to a maximum depth of 11 feet below ground surface. The Geotechnical Engineering Report also indicated that groundwater levels in the area may fluctuate seasonally depending on precipitation, irrigation practices, time of year, and nearby surface water conditions associated with the Sacramento River Deep Water Channel. Depending on construction timing and location, construction and subsurface excavations associated with the proposed project could encounter groundwater and temporary dewatering may be required. This could result in subsidence and a **potentially significant** impact.

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10 City of West Sacramento. 2016. *City of West Sacramento General Plan Update Draft Environmental Impact Report. Section 3.6, Geology, Soils, and Paleontological Resources.* August.

11 Ibid.

12 Lofgren, B.E., & Ireland, R.L. 1974. *Preliminary Investigation of Land Subsidence in the Sacramento Valley, California (U.S. Geological Survey Open-File Report 74-1064)*. U.S. Geological Survey. Website: https://pubs.usgs.gov/of/1974/1064/report.pdf (accessed February 2026).

13 California Department of Water Resources. 2025. *DWR Semi-Annual Groundwater Conditions Update: Highlights for Water-Year 2024* (semi-annual update). California Department of Water Resources. Website: https://data.cnra.ca.gov/dataset/california-s-groundwater-semi-annual-conditions-updates/resource/fe2f982a-cc34-4b11-a6e7-6aef5e5cb8d6 (accessed February 2026).

Mitigation Measure GEO-1 requires incorporation of all recommendations included in the Geotechnical Engineering Report into project design and construction. This includes dewatering methods. Potential dewatering methods could include the use of sumps, submersible pumps, deep wells, or a well-point system, depending on soil conditions, excavation depth, and the amount of groundwater present. If required, the chosen dewatering method would be designed and constructed by a qualified dewatering contractor. Any groundwater dewatering activities would be required to comply with the Central Valley RWQCB's Groundwater Discharge Permit, **Regulatory Compliance Measure WQ-2** (please refer to Section 4.10 Hydrology and Water Quality), which requires groundwater to be tested and treated, if necessary, prior to discharge to surface water. Although the specific method and discharge location have not been determined at this time, any dewatering would be temporary and localized and would be managed in accordance with the Groundwater Discharge Permit. **Mitigation Measure GEO-1** would reduce potentially significant impacts related to subsidence and ground settlement to a less than significant level. Therefore, impacts related to land subsidence would be **less than significant with mitigation incorporated**.

4.7.6.4 Liquefaction and Compressible/Collapsible Soils

Less Than Significant Impact. As discussed above under Threshold 4.7.1(iii), the project site is located within an area designated by the State of California as having a very low potential for seismically induced liquefaction hazards. Based on the results of the subsurface explorations, (**Appendix E**) the project site generally consists of stiff to hard fat clay extending to a depth of approximately five to seven feet below the ground surface. Excavation during construction of the proposed project is expected to extend to a maximum depth of 11 feet below ground surface. However, the firm to stiff cohesive soils with some medium to dense clayey sand layers that generally underlie the project site are not susceptible to liquefaction**.** Additionally, the Geotechnical Engineering Report concluded that these soils have a low potential for collapse, and no highly compressible or collapsible layers were encountered during the subsurface exploration.

Some undocumented fill was encountered in the northern portion of the site at Test Pit TP2, where up to three feet of lean clay fill was identified. The Geotechnical Engineering Report identified the approximate area of fill as being located along Marshall Road, roughly from Street B, on both sides of Street C to Main Avenue and then north of Street C to Otis Avenue. However, these soils are also not typically susceptible to liquefaction, compression, or collapse. Therefore, impacts related to liquefaction and compressible/collapsible soils would be **less than significant**. No mitigation would be required.

Threshold 4.7.4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant with Mitigation Incorporated. Expansive soils are characterized by the potential for shrinking and swelling as the moisture content of the soil decreases and increases. The shrink-swell potential is influenced by the amount and type of clay minerals present and can be measured by the percent change of the soil volume. Testing at the project site indicated that near-surface clay was found to have moderate to very high expansion potential, which could result in a **potentially significant** impact. The proposed project would be developed in compliance with the

requirements of the CBC and implementation of **Mitigation Measure GEO-1**. **Mitigation Measure GEO-1** requires all recommendations included in the Geotechnical Engineering Report be incorporated into project design and construction. These recommendations include the use of post tensioned foundations, deepened foundations, pre-saturation of the slab subgrade, and reinforcement of floor slabs, all techniques that would ensure that potential risks to people and structures as a result of expansive soils would be reduced to **less than significant with mitigation incorporated**.

Threshold 4.7.5: Does the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The proposed project would connect to the City's wastewater conveyance system, and as detailed in Sections 4.19.3.2 and 4.19.6.2 in Section 4.19, Utilities and Service Systems, the City's system has enough capacity to handle the project. On-site treatment and disposal of wastewater is not proposed or necessary; therefore, the proposed project would have **no impact** associated with soils incapable of supporting alternative wastewater disposal systems.

Threshold 4.7.6: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant With Mitigation Incorporated. Although no paleontological resources or unique geological features are known to exist within or near the project site, the proposed project would require ground disturbance to a depth of up to 11 feet below ground surface during construction activities. The possibility of accidental discovery of paleontological resources during project construction cannot be discounted and the proposed project would result in a **potentially significant impact** to unique paleontological resources. Therefore, the proposed project would be required to implement **Mitigation Measure GEO-2,** which requires treatment protocols for the accidental discovery of such resources. Accordingly, implementation of **Mitigation Measure GEO-2** would reduce potential impacts to paleontological resources to **less than significant with mitigation incorporated**.

4.7.7 Cumulative Impacts

Less Than Significant with Mitigation Incorporated. As defined in Section 15355(b) of the *State CEQA Guidelines*, cumulative impacts refer to the incremental impacts of the project added to other closely related past, present, and reasonably foreseeable probable future projects. The cumulative study area for geology and soils is described in Chapter 4.0; the cumulative project list is provided in Chapter 4.0, **Table 4.A**, and a map of the cumulative project locations is provided in Chapter 4.0, **Figure 4-1**.

Typically, geology and soils impacts are specific to a particular project site and there is little, if any, cumulative relationship between the development of a proposed project and development within a larger cumulative area. Moreover, while seismic conditions are regional in nature, seismic impacts on a given project site are site-specific. For example, development within the project site would not alter geologic events or soil features/characteristics (such as ground shaking, seismic intensity, or soil

expansion or compression). Therefore, the proposed project would not affect the level of intensity at which a seismic event on an adjacent site is experienced. While seismic events may affect a broad region, development of the 26 cumulative projects would not increase the intensity, frequency, or duration of seismic events or the properties of off-site geology or soils. The CBC (adopted by reference in Chapter 15.12, [Building Code] of the City's Municipal Code) contains provisions to safeguard against major structural failures or loss of life caused by earthquakes, liquefaction, ground shaking, landslides, and other seismically induced hazards. In addition, the Geotechnical Engineering recommendations (**Mitigation Measure GEO-1**) would reduce potential impacts related to seismic ground shaking, liquefaction, compressible/collapsible soils, and expansive soils. Cumulative development projects would be required to undergo environmental review pursuant to the California Environmental Quality Act (CEQA) including, as necessary, site-specific investigation of potential geologic, seismic, or soil-related impacts. It is reasonable to expect that such site-specific investigation would appropriately identify the siting, design, and construction criteria established in the CBC and/or by the city to address site- specific geologic/soil conditions affecting future development, and that the city would condition future development to fully satisfy said criteria. Therefore, cumulative geologic, seismic, or soil-related impacts would be rendered to a less than significant level, and the project's contribution to such impacts would not be cumulatively considerable.

It is not anticipated that the development of cumulative projects would have any geotechnical impact on the project site or the buildings that would be constructed as part of the proposed project, nor would the project have geotechnical impacts on any of the 26 cumulative projects identified in **Table 4.A**, in Chapter 4.0. Therefore, the proposed project and the applicable cumulative projects would not have the potential to cause cumulatively significant adverse impacts related to geology and soils.

Potential impacts of the proposed project to unknown paleontological resources and unique geologic features, when combined with the impacts of past, present, and reasonably foreseeable probable future projects in the City of West Sacramento, could contribute to a **potentially cumulatively significant impact** due to the overall loss of paleontological remains unique to the region. However, each development proposal received by the City is required to undergo environmental review pursuant to CEQA. If there were any potential for significant impacts to paleontological resources or unique geologic features, an investigation would be required to determine the nature and extent of the resources and identify appropriate mitigation measures.

When resources are assessed and/or protected as they are discovered, impacts to these resources are less than significant. Implementation of **Mitigation Measures GEO-1** and **GEO-2** would ensure that the proposed project, together with the cumulative projects, would not result in significant cumulative impacts to unique paleontological resources or unique geologic features. Therefore, this impact would be **less than significant with mitigation incorporated.**

4.7.8 Level of Significance Prior to Mitigation

The proposed project would have less than significant impacts related to rupture of a known earthquake fault, seismic-related ground failure, and soil erosion or the loss of topsoil. Potential impacts related to seismic shaking and unstable soils would be potentially significant prior to

mitigation. The proposed project would also result in potential impacts to paleontological resources prior to mitigation.

4.7.9 Regulatory Compliance Measures and Mitigation Measures

4.7.9.1 Regulatory Compliance Measures

The proposed project would be required to comply with the standards set forth in **Regulatory Compliance Measures WQ-1, WQ-2,** and **WQ-3**, as detailed in Section 4.10, Hydrology and Water Quality, which are intended to reduce impacts related to erosion or the loss of topsoil.

4.7.9.2 Mitigation Measures

The following mitigation measures are required to reduce potentially significant impacts related to seismic ground shaking, liquefaction, and paleontological resources to a less than significant level:

Mitigation Measure GEO-1 **Implementation of Geotechnical Evaluation Recommendations.** The Project Applicant's construction contractor shall implement the recommendations of the Geotechnical Engineering Report prepared for the proposed project, as applicable, to the satisfaction of the City of West Sacramento's (City) Building Official, or designee. The City's Building Official, or designee, shall confirm recommendations have been implemented into the design and construction of the proposed project prior to the issuance of a building permit.

Mitigation Measure GEO-2 **Discovery of Paleontological Resources.** Should paleontological resources be encountered during project subsurface construction activities, all ground-disturbing activities within 25 feet shall be redirected and a qualified paleontologist contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. For purposes of this mitigation, a "qualified paleontologist" shall be an individual with the following qualifications: (1) a graduate degree in paleontology or geology and/or a person with a demonstrated publication record in peer-reviewed paleontological journals; (2) at least two years of professional experience related to paleontology; (3) proficiency in recognizing fossils in the field and determining their significance; (4) expertise in local geology, stratigraphy, and biostratigraphy; and (5) experience collecting vertebrate fossils in the field. If the paleontological resources are found to be significant and project activities cannot avoid them, measures shall be implemented to ensure that the project does not cause a substantial adverse change in the significance of the paleontological resource. Measures may include monitoring, recording the fossil locality, data recovery and analysis, a final report, and accessioning the fossil material and technical report to a paleontological repository. Upon completion of the assessment, a report documenting methods,

findings, and recommendations shall be prepared and submitted to the City for review. If paleontological materials are recovered, this report also shall be submitted to a paleontological repository such as the University of California Museum of Paleontology, along with significant paleontological materials. Public educational outreach may also be appropriate. The Applicant shall inform its contractor(s) of the sensitivity of the project site for paleontological resources and shall verify that the following directive has been included in the appropriate contract documents:

> "The subsurface of the construction site may be sensitive for fossils. If fossils are encountered during project subsurface construction, all ground-disturbing activities within 25 feet shall be redirected and a qualified paleontologist contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. Project personnel shall not collect or move any paleontological materials. Fossils can include plants and animals, and such trace fossil evidence of past life as tracks or plant imprints. Ancient marine sediments may contain invertebrate fossils such as snails, clam and oyster shells, sponges, and protozoa; and vertebrate fossils such as fish, whale, and sea lion bones. Contractor acknowledges and understands that excavation or removal of paleontological material is prohibited by law and constitutes a misdemeanor under California Public Resources Code, Section 5097.5."

4.7.10 Level of Significance after Mitigation

Potentially significant impacts would be reduced to less than significant levels after mitigation. Therefore, with implementation of **Mitigation Measures GEO-1** and **GEO-2** and **Regulatory Compliance Measures WQ-1, WQ-2,** and **WQ-3**, as detailed in Section 4.10, Hydrology and Water Quality, the proposed project would not result in any significant impacts related to geology and soils.

4.8 GREENHOUSE GAS EMISSIONS

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for the Brar Farms Residential Development Project (proposed project) to impact greenhouse gas emissions from project implementation in the City of West Sacramento (City). This section is based in part on the *Air Quality, Greenhouse Gas, and Energy Impact Report* (Air Quality/GHG/Energy Analysis) prepared for the project and included in this Draft EIR as **Appendix B**.

4.8.1 Scoping Process

Several comments received during the scoping period addressed greenhouse gas (GHG) emissions. These comments raised concerns related to construction and operational greenhouse gas emissions, and the cumulative greenhouse gas impacts associated with the proposed project and all pending and approved residential developments in West Sacramento.

4.8.2 Methodology

This analysis used the California Emissions Estimator Model (CalEEMod) version 2022.1. to quantify the potential GHG emissions associated with both construction and operation of the proposed project.

4.8.3 Existing Environmental Setting

The following section provides background information on GHGs and global climate change.

4.8.3.1 Greenhouse Gases

Global climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans in recent decades. The Earth's average near-surface atmospheric temperature rose 0.6 ± 0.2 degree Celsius (°C) or 1.1 ± 0.4 degrees Fahrenheit (°F) in the 20th century. The prevailing scientific opinion on climate change is that most of the warming observed over the last 50 years is attributable to human activities. The increased amounts of carbon dioxide (CO_2) and other GHGs are the primary causes of the human-induced component of warming. GHGs are released by the burning of fossil fuels, land clearing, agriculture, and other activities, and lead to an increase in the greenhouse effect.[1]

GHGs are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced global climate change are the following:

[1] The temperature on Earth is regulated by a system commonly known as the "greenhouse effect." Just as the glass in a greenhouse allows heat from sunlight in and reduces the heat escaping, GHGs such as carbon dioxide, methane, and nitrous oxide in the atmosphere keep the Earth at a relatively even temperature. Without the greenhouse effect, the Earth would be a frozen globe; thus, although an excess of GHGs results in global warming, the *naturally occurring* greenhouse effect is necessary to keep the planet at a comfortable temperature.

- CO_2
- Methane (CH_4)
- Nitrous oxide (N_2O)
- Hydrofluorocarbons (HFCs)
- Perfluorocarbons (PFCs)
- Sulfur hexafluoride (SF_6)

Over the last 200 years, humans have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere and enhancing the natural greenhouse effect, which is believed to be causing global warming. Although man-made GHGs include naturally occurring GHGs such as CO_2, CH_4, and N_2O, some gases, such as HFCs, PFCs, and SF_6, are completely new to the atmosphere.

Certain gases, such as water vapor, are short-lived in the atmosphere. Others remain in the atmosphere for significant periods of time, contributing to climate change in the long term. Water vapor is excluded from the list of GHGs above because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation. For the purposes of this analysis, the term "GHGs" will refer collectively only to the six gases listed above.

These gases vary considerably in terms of global warming potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The global warming potential is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and length of time that the gas remains in the atmosphere ("atmospheric lifetime"). The GWP of each gas is measured relative to CO_2, the most abundant GHG; the definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO_2 over a specified time period. GHG emissions are typically measured in terms of pounds or tons of "CO_2 equivalents" (CO_2e).

The following paragraphs summarize the characteristics of the six GHGs.

Carbon Dioxide. In the atmosphere, carbon generally exists in its oxidized form, as CO_2. Natural sources of CO_2 include the respiration (breathing) of humans, animals, and plants, volcanic outgassing, decomposition of organic matter, and evaporation from the oceans. Human-caused sources of CO_2 include the combustion of fossil fuels and wood, waste incineration, mineral production, and deforestation. Natural sources release approximately 150 billion tons of CO_2 each year, far outweighing the 7 billion tons of manmade emissions of CO_2 each year. Nevertheless, natural removal processes, such as photosynthesis by land- and ocean-dwelling plant species, cannot keep pace with this extra input of manmade CO_2, and consequently, the gas is building up in the atmosphere. In 2022, total annual CO_2 accounted for approximately 81 percent of California's overall GHG emissions.[2] Transportation is the single largest source of CO_2 in California, which primarily

[2] California Air Resources Board (CARB). 2024. *Assembly Bill 32 Greenhouse Gas Emissions Inventory for 2000-2022 – by Gas*.

consists of on-road travel. Electricity production, industrial and residential sources also make non-negligible contributions to CO_2 emissions in California.

Methane. CH_4 is produced when organic matter decomposes in environments lacking sufficient oxygen. Natural sources include wetlands, termites, and oceans. Decomposition occurring in landfills accounts for the majority of human-generated CH_4 emissions in California and in the United States as a whole. Agricultural processes such as intestinal fermentation, manure management, and rice cultivation are also significant sources of CH_4 in California. Total annual emissions of CH_4 accounted for approximately 9.8 percent of GHG emissions in California in 2022.[3]

Nitrous Oxide. N_2O is produced naturally by a wide variety of biological sources, particularly microbial action in soils and water. Tropical soils and oceans account for the majority of natural source emissions. Nitrous oxide is a product of the reaction that occurs between nitrogen and oxygen during fuel combustion. Both mobile and stationary combustion emit N_2O, and the quantity emitted varies according to the type of fuel, technology, and pollution control device used, as well as maintenance and operating practices. Agricultural soil management and fossil fuel combustion are the primary sources of human-generated N_2O emissions in California. N_2O emissions accounted for approximately 3.4 percent of GHG emissions in California in 2022.[4]

Hydrofluorocarbons, Perfluorocarbons, and Sulfur Hexafluoride. HFCs are primarily used as substitutes for ozone-depleting substances regulated under the Montréal Protocol, which is an international treaty that was approved on January 1, 1989, and was designated to protect the ozone layer by phasing out the production of several groups of halogenated hydrocarbons believed to be responsible for ozone depletion.[5] PFCs and SF_6 are emitted from various industrial processes, including aluminum smelting, semiconductor manufacturing, electric power transmission and distribution, and magnesium casting. There is no aluminum or magnesium production in California; however, the rapid growth in the semiconductor industry leads to greater emissions of PFCs. HFCs, PFCs, and SF_6 that accounted for about 5.7 percent of GHG emissions in California in 2022.[6]

4.8.3.2 Emissions Inventories

An emissions inventory that identifies and quantifies the primary human-generated sources and sinks of GHGs is a well-recognized and useful tool for addressing climate change. This section summarizes the latest information on global, United States, California, and City GHG emissions inventories. Under existing conditions, the project site is vacant; therefore, there are currently no GHG emissions generated within the project site.

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3 California Air Resources Board (CARB). 2024. *Assembly Bill 32 Greenhouse Gas Emissions Inventory for 2000-2022 – by Gas*.

4 *Ibid*.

5 United Nations Treaty Collection. n.d. *Montreal Protocol on Substances that Deplete the Ozone Layer*. Website: https://treaties.un.org/pages/ViewDetails.aspx?src=TREATY&mtdsg_no=XXVII-2-a&chapter=27&clang=_en (accessed May 2026).

6 California Air Resources Board (CARB). 2024. *Assembly Bill 32 Greenhouse Gas Emissions Inventory for 2000-2022 – by Gas*.

United States Emissions. In 2022, the year for which the most recent data are available, the United States emitted about 6,343.2 million metric tons (MMT) of CO_2e. Overall, emissions in 2022 increased by 0.2 percent compared to the 2021 total GHG emissions. This increase in total GHG emissions was driven by fossil fuel combustion due primarily to economic activity rebounding after the height of the COVID-19 pandemic. However, GHG emissions in 2022 were 16.7 percent below those of 2005 levels. Of the five major sectors—residential and commercial, agricultural, industry, transportation, and electricity generation—transportation accounted for the highest amount of GHG emissions in 2022 (28 percent), with electricity generation second at 25 percent and emissions from industry third at 23 percent.[7]

State of California Emissions. The State emitted approximately 371.1 MMT CO_2e emissions in 2022, 9.3 MMT CO_2e lower than 2021 levels.[8] The California Air Resources Board (CARB) estimates that transportation was the source of approximately 37.7 percent of the State's GHG emissions in 2022. The next largest sources included industrial sources at approximately 19.6 percent and electricity generation at 16.1 percent. The remaining sources of GHG emissions were commercial and residential activities at 10.6 percent, agriculture at 8.0 percent, and high GWP activities at 5.7 percent.[9]

City of West Sacramento Emissions. According to the City of West Sacramento's *Climate Action and Adaptation Plan*, the city's baseline emissions for 2018 totaled approximately 398,800 MT CO_2e.[10] The transportation sector was the largest source of emissions, making up 64 percent of the total emissions. The next largest source was the energy sector at approximately 30 percent, and the remaining 6 percent of emissions came from the waste sector.[11]

4.8.4 Regulatory Setting

Federal, State, and local regulations and programs related to greenhouse gas emissions that are applicable to the proposed project are described below.

4.8.4.1 Federal Regulations

Federal Clean Air Act (CAA). The United States has historically had a voluntary approach to reducing GHG emissions. However, on April 2, 2007, the United States Supreme Court ruled in *Massachusetts v. E.P.A.* (2007) 549 U.S. 497 that the United States Environmental Protection Agency (USEPA) has the authority to regulate CO_2 emissions of motor vehicles under the federal Clean Air Act. Although there currently are no adopted federal regulations for the control or reduction of GHG emissions, the

7 United States Environmental Protection Agency. 2024. Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2022. Website: https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks-1990-2022 (accessed May 2026).

8 California Air Resources Board (CARB). 2024. *California Greenhouse Gas Emissions for 2000 to 2022, Trends of Emissions and Other Indicators Report*. Website: https://ww2.arb.ca.gov/sites/default/files/2024-09/nc-2000_2022_ghg_inventory_trends.pdf (accessed May 2026).

9 *Ibid*.

10 City of West Sacramento. 2025. *Climate Action and Adaptation Plan*. June. Website: https://www.cityofwestsacramento.org/home/showpublisheddocument/20579/638860179110630000 (accessed July 2026).

11 *Ibid.*

USEPA commenced several actions in 2009 to implement a regulatory approach to global climate change.

The USEPA commenced several actions in 2009 to implement a regulatory approach to global climate change, including the 2009 USEPA final rule for mandatory reporting of GHGs from large GHG emission sources in the United States. Additionally, the USEPA Administrator signed an endangerment finding action in 2009 under the CAA, finding that seven GHGs (CO_2, CH_4, N_2O, HFCs, nitrogen trifluoride [NF_3], PFCs, and SF_6) constitute a threat to public health and welfare, and that the combined emissions from motor vehicles cause and contribute to global climate change, leading to national GHG emission standards.

The Inflation Reduction Act of 2022 reaffirmed the USEPA's authority to regulate GHG emissions under the CAA. In January 2025, Executive Order (EO) 14153, Unleashing American Energy, agencies were directed to stop issuing funds under the Inflation Reduction Act (IRA). A bill has been introduced to repeal the IRA, but it has not been passed through the legislative process as of October 2025.

4.8.4.2 State Regulations

Assembly Bill 32 (2006), California Global Warming Solutions Act. California's major initiative for reducing GHG emissions is Assembly Bill (AB) 32, passed by the State legislature on August 31, 2006. This effort aims at reducing GHG emissions to 1990 levels by 2020. The CARB has established the level of GHG emissions in 1990 at 427 million metric tons (MMT) of CO_2e. The emissions target of 427 MMT requires the reduction of 169 MMT from the State's projected business-as-usual 2020 emissions of 596 MMT. AB 32 requires the CARB to prepare a Scoping Plan that outlines the main State strategies for meeting the 2020 deadline and to reduce GHGs that contribute to global climate change. The Scoping Plan was approved by the CARB on December 11, 2008, and contains the main strategies California will implement to achieve the reduction of approximately 169 MMT CO_2e, or approximately 30 percent, from the State's projected 2020 emissions level of 596 MMT CO_2e under a business-as-usual scenario (this is a reduction of 42 MMT CO_2e, or almost 10 percent from 2002–2004 average emissions). The Scoping Plan also includes CARB-recommended GHG reductions for each emissions sector of the State's GHG inventory. The Scoping Plan calls for the largest reductions in GHG emissions to be achieved by implementing the following measures and standards:

- Improved emissions standards for light-duty vehicles (estimated reductions of 31.7 MMT CO_2e);
- The Low-Carbon Fuel Standard (15.0 MMT CO_2e);
- Energy efficiency measures in buildings and appliances and the widespread development of combined heat and power systems (26.3 MMT CO_2e); and
- A renewable portfolio standard for electricity production (21.3 MMT CO_2e).

The CARB approved the First Update to the Climate Change Scoping Plan on May 22, 2014. The First Update identifies opportunities to leverage existing and new funds to further drive GHG emission reductions through strategic planning and targeted low carbon investments. The First Update defines

CARB climate change priorities until 2020, and also sets the groundwork to reach long-term goals set forth in EOs S-3-05 and B-16-2012. The Update highlights California's progress toward meeting the "near-term" 2020 GHG emission reduction goals as defined in the initial Scoping Plan. It also evaluates how to align the State's "longer-term" GHG reduction strategies with other State policy priorities for water, waste, natural resources, clean energy, transportation, and land use. CARB released a second update to the Scoping Plan, the 2017 Scoping Plan,[12] to reflect the 2030 target set by EO B-30-15 and codified by Senate Bill (SB) 32.

The 2022 Scoping Plan[13] was approved in December 2022 and assesses progress toward achieving the SB 32 2030 target and lay out a path to achieve carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

The 2022 Scoping Plan focuses on building clean energy production and distribution infrastructure for a carbon-neutral future, including transitioning existing energy production and transmission infrastructure to produce zero-carbon electricity and hydrogen, and utilizing biogas resulting from wildfire management or landfill and dairy operations, among other substitutes. The 2022 Scoping Plan states that in almost all sectors, electrification will play an important role. The 2022 Scoping Plan evaluates clean energy and technology options and the transition away from fossil fuels, including adding four times the solar and wind capacity by 2045 and about 1,700 times the amount of current hydrogen supply. As discussed in the 2022 Scoping Plan, EO N-79-20 requires that all new passenger vehicles sold in California will be zero-emission by 2035, and all other fleets will have transitioned to zero-emission as fully possible by 2045, which will reduce the percentage of fossil fuel combustion vehicles.

Senate Bill 375 (2008). Signed into law on October 1, 2008, SB 375 supplements GHG reductions from new vehicle technology and fuel standards with reductions from more efficient land use patterns and improved transportation in an effort to reduce vehicle miles traveled (VMT). Under the law, the CARB approved GHG reduction targets in February 2011 for California's 18 federally designated regional planning bodies, known as Metropolitan Planning Organizations (MPOs). The CARB may update the targets every 4 years and must update them every 8 years. MPOs, in turn, must demonstrate how their plans, policies, and transportation investments meet the targets set by the CARB through Sustainable Communities Strategies (SCSs). The SCSs are included with the Regional Transportation Plan, a report required by State law.

Executive Order EO B-30-15 (2015). Governor Jerry Brown signed EO B-30-15 on April 29, 2015, which added the immediate target of:

- GHG emissions should be reduced to 40 percent below 1990 levels by 2030.

[12] California Air Resources Board (CARB). 2017. *California's 2017 Climate Change Scoping Plan*. November.

[13] California Air Resources Board (CARB). 2022. *2022 Scoping Plan Update*. May 10. Website: https://ww2.arb.ca.gov/sites/default/files/ 2023-04/2022-sp.pdf (accessed May 2026).

All State agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB was directed to update the AB 32 Scoping Plan to reflect the 2030 target, and therefore, is moving forward with the update process. The mid-term target is critical to help frame the suite of policy measures, regulations, planning efforts, and investments in clean technologies and infrastructure needed to continue reducing emissions.

Senate Bill 350 (2015) Clean Energy and Pollution Reduction Act. SB 350, signed by Governor Jerry Brown on October 7, 2015, updates and enhances AB 32 by introducing the following set of objectives in clean energy, clean air, and pollution reduction for 2030:

- Raise California's renewable portfolio standard from 33 percent to 50 percent; and
- Increasing energy efficiency in buildings by 50 percent by the year 2030.

The 50 percent renewable energy standard will be implemented by the California Public Utilities Commission (CPUC) for the private utilities and by the California Energy Commission (CEC) for municipal utilities. Each utility must submit a procurement plan showing it will purchase clean energy to displace other non-renewable resources. The 50 percent increase in energy efficiency in buildings must be achieved through the use of existing energy efficiency retrofit funding and regulatory tools already available to state energy agencies under existing law. The addition made by this legislation requires State energy agencies to plan for and implement those programs in a manner that achieves the energy efficiency target.

Senate Bill 32, California Global Warming Solutions Act of 2016, and Assembly Bill 197. In summer 2016 the Legislature passed, and the Governor signed, SB 32, and AB 197. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in Governor Brown's April 2015 EO B-30-15. SB 32 builds on AB 32 and keeps California on the path toward achieving the State's 2050 objective of reducing emissions to 80 percent below 1990 levels, consistent with an Intergovernmental Panel on Climate Change (IPCC) analysis of the emissions trajectory that would stabilize atmospheric GHG concentrations at 450 parts per million CO_2e and reduce the likelihood of catastrophic impacts from climate change.

The companion bill to SB 32, AB 197, provides additional direction to CARB related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 meant to provide easier public access to air emissions data that are collected by CARB was posted in December 2016.

Senate Bill 100. On September 10, 2018, Governor Brown signed SB 100, which raises California's Renewables Portfolio Standard (RPS) requirements to 60 percent by 2030, with interim targets, and 100 percent by 2045. The bill also establishes a State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Executive Order B-55-18. EO B-55-18, signed September 10, 2018, sets a goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." EO B-55-18 directs CARB to work with relevant State agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The goal of carbon neutrality by 2045 is in addition to other statewide goals, meaning not only should emissions be reduced to 80 percent below 1990 levels by 2050, but that, by no later than 2045, the remaining emissions be offset by equivalent net removals of CO_2e from the atmosphere, including through sequestration in forests, soils, and other natural landscapes.

Assembly Bill 1279. AB 1279 was signed in September 2022 and codifies the State goals of achieving net carbon neutrality by 2045 and maintaining net negative GHG emissions thereafter. AB 1279 also requires California to reduce statewide GHG emissions by 85 percent compared to 1990 levels by 2045 and directs CARB to work with relevant State agencies to achieve these goals.

Title 24, Part 11, Building Standards Code and CALGreen Code. In November 2008, the California Building Standards Code established the California Green Building Standards Code (CALGreen Code), which sets performance standards for residential and non-residential development to reduce environmental impacts and encourage sustainable construction practices. The CALGreen Code addresses energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. The CALGreen Code is updated every 3 years and was most recently updated in 2022 to include new mandatory measures for residential as well as non-residential uses; the new measures took effect on January 1, 2023. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions.

Title 24, Part 6, California Building Efficiency Standards. The California Building Standards Code, or Title 24 of the California Code of Regulations (CCR) contains the regulations that govern the construction of buildings in California. Part 6 is California's Energy Efficiency Standards for Residential and Non-Residential Buildings. These standards were first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption and are updated on an approximately 3-year cycle to allow consideration and possible incorporation of new energy efficient technologies and methods. All buildings for which an application for a building permit is submitted on or after January 1, 2023, must follow the 2022 standards. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions.

Executive Order N-79-20. EO N-79-20, which was signed by the Governor on September 23, 2020, sets the following goals for the State: 100 percent of in-state sales of new passenger cars and trucks shall be zero-emission by 2035; 100 percent of medium- and heavy-duty vehicles in the State shall be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks; and 100 percent of off-road vehicles and equipment in the State shall be zero-emission by 2035, where feasible.

California Integrated Waste Management Act. To minimize the amount of solid waste that must be disposed of in landfills, the State Legislature passed the California Integrated Waste Management Act of 1989 (AB 939), effective January 1990. According to AB 939, all cities and counties were required to divert 25 percent of all solid waste from landfill facilities by January 1, 1995, and 50 percent by January 1, 2000. In 2011, AB 341 modified the California Integrated Waste

Management Act and directed the California Department of Resources Recycling and Recovery (CalRecycle) to develop and adopt regulations for mandatory commercial recycling. AB 341 also established a statewide recycling goal of 75 percent; the 50 percent disposal reduction mandate still applies for cities and counties under AB 939. In April 2016, AB 1826 further modified the California Integrated Waste Management Act, requiring businesses that generate a specified amount of organic waste per week to arrange for recycling services for that organic waste in a specified manner.

4.8.4.3 Regional Regulations

Yolo-Solano Air Quality Management District. The Yolo-Solano Air Quality Management (YSAQMD) has not yet established a threshold of significance for GHGs as it is unlikely that any one project would substantially contribute to global climate change. YSAQMD advises that lead agencies evaluate whether a project's incremental direct and indirect GHG emissions are cumulatively considerable. If the lead agency jurisdiction has adopted a Climate Action Plan or General Plan goals and policies with regard to GHGs, the environmental review should base its analysis on the provisions of those documents.

Sacramento Area Council of Governments. As the designated MPO for the six-county 22-city Sacramento metropolitan region, Sacramento Area Council of Governments (SACOG) prepares several plans to address regional growth, including the Metropolitan Transportation Plan (MTP/SCS). SACOG is mandated by federal and State law to research and draw up plans for transportation, growth management, hazardous waste management, and a regional growth forecast that is the foundation for these plans and regional air quality plans. SACOG prepares several plans to address regional growth, including the Regional Comprehensive Plan and Guide, Regional Housing Needs Assessment (RHNA), the Metropolitan Transportation Plan (RTP), the Regional Transportation Improvement Program (RTIP), and the annual State of the Region reports to measure progress toward achieving regional planning goals and policies. In 2022, the SACOG Board adopted the 2025 Blueprint growth projections for population, employment, and households in the region. On November 20, 2025, SACOG adopted the MTP/SCS to the final 2025 Blueprint Plan.[14]

4.8.4.4 Local Regulations

City of West Sacramento 2035 General Plan. The City of West Sacramento addresses GHGs in the Safety Element of its General Plan. The following policies from the Safety Element are applicable to the proposed project:

- **Goal S-4:** To alleviate the effects of climate change by reducing greenhouse gas emissions and adapting to expected climate change impacts.
    - **Policy S-4.1:** The City shall strive to reduce community greenhouse gas emissions to the following levels:
        - 30 percent below "business as usual" emissions in 2005 levels by 2020; and

[14] Sacramento Area Council of Governments (SACOG). 2025. *2025 Blueprint.* Website: https://www.sacog.org/planning/2025-blueprint/2025-blueprint-plan (accessed June 2026).

- 30 percent below "business as usual" emissions levels by 2030.

- **Policy S-4.3:** The City shall, in collaboration with stakeholders from the community, implement policies and measures to reduce greenhouse gas emissions from community, business, and municipal activities consistent with the targets described in Policies HS-5.1 and 5.2.

- **Policy S-4.4:** The City shall monitor greenhouse gas emissions and maintain greenhouse gas emissions inventories for municipal operations, business sectors, and the community, using methods approved by or consistent with guidance from the California Air Resources Board.

- **Policy S-4.5:** The City shall support State and Federal actions to reduce greenhouse gas emissions.

- **Policy S-4.6:** The City shall support the development of technological improvements that reduce greenhouse gas emissions, and encourage residents and businesses to integrate into their operations and daily lives new greenhouse gas reducing technologies.

- **Policy S-4.7:** The City shall monitor the local and regional impacts of climate change, and use adaptive management techniques and the latest climate change science to implement, and/or revise if necessary, strategies to respond to the expected impacts of climate change.

City of West Sacramento Draft Climate Action and Adaption Plan (CAAP). The City's CAAP was adopted by the City Council on June 4, 2025.[15] The Final CAAP includes policies and strategies to reduce community and municipal GHG emissions. It builds upon the City's long-term planning vision for the future established in the City's 2035 General Plan. In addition, the CAAP describes development of the City's 2030 and 2045 reduction targets, detailing their consistency with state legislation and executive orders and establishes that meeting the reduction targets would avoid cumulatively considerable effects. The CAAP was developed consistent with state guidelines that pertain to local plans "for the reduction or mitigation of GHG emissions" (pursuant to SB 97 and *State CEQA Guidelines* Section 15183.5), allowing the City to use the CAAP rather than project-level analysis for GHG emissions impact assessment for future projects.

4.8.5 Thresholds of Significance

4.8.5.1 CEQA Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the proposed project would have a significant adverse impact with respect to GHG emissions if it would:

[15] City of West Sacramento. 2025. *City of West Sacramento Climate Action and Adaptation Plan*. June 4. Website: https://www.cityofwestsacramento.org/home/showpublisheddocument/20579/638860179110630000 (accessed May 2026).

Threshold 4.8.1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or

Threshold 4.8.2: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

4.8.6 Project Impacts

Threshold 4.8.1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

This section describes the proposed project's construction- and operational-related GHG emissions and contribution to global climate change.

4.8.6.1 Short-Term Greenhouse Gas Emissions

Less Than Significant Impact. Construction activities associated with the construction of residential and nonresidential development capacity would cause short-term GHG emissions. Construction activities associated with the proposed project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O. Furthermore, CH_4 is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

The YSAQMD has not adopted a threshold of significance for construction-related GHG emissions. Similarly, the Bay Area Air Quality Management District (Bay Area Air District), located immediately to the west of the YSAQMD, has not developed a quantitative threshold of significance for construction GHG Emissions because such emissions are temporary and variable.[16] The Sacramento Metropolitan Air Quality District (SMAQD), located to the east of the YSAQMD has adopted a construction emissions threshold of 1,100 metric tons of CO_2e (MT CO_2e) per year.[17]

Consistent with YSAQMD guidance, the significance determination for this impact statement is based on project consistency with a qualified GHG reduction plan, as discussed below. However, lead agencies are encouraged to quantify and disclose GHG emissions that would occur during construction. Using CalEEMod, it is estimated that construction of the proposed project would generate approximately 1,136 MT CO_2e over the 18-month construction period. Construction-related emissions would be temporary and would not persist upon completion of construction. Although YSAQMD does not have an adopted threshold of significance for

16 Bay Area Air District (Air District). 2022 CEQA Guidelines: Chapter 6 Project-Level Climate Impacts. Website: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-6-project-climate-impacts_final-pdf.pdf?rev=ce3ba3fe9d39448f9c15bbabd8c36c7f&sc_lang=en (accessed May 2026).

17 Sacramento Metropolitan Air Quality District (SMAQD). 2020. SMAQD Thresholds of Significance. Website: https://www.airquality.org/LandUseTransportation/Documents/CH2ThresholdsTable4-2020.pdf (accessed May 2026).

construction-related GHG emissions, the neighboring SMAQMD has a construction threshold of 1,100 MT CO_2e per year. Because the estimated 1,136 MT CO_2e would be generated over approximately 18-months (one and a half years), rather than within a single year, average annual emissions would be approximately 757 MT CO_2e. [18] Therefore annual construction emissions generated by the proposed project would be below the SMAQMD threshold.

4.8.6.2 Long-Term Greenhouse Gas Emissions

Long-term GHG emissions are typically generated from mobile sources (e.g., vehicle and truck trips), area sources (e.g., maintenance activities and landscaping), indirect emissions from sources associated with energy consumption, waste sources (land filling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution). Mobile-source GHG emissions would include project-generated vehicle trips to and from the project. Area-source emissions would be associated with activities such as landscaping and maintenance on the project site. Energy source emissions would be generated at off-site utility providers as a result of increased electricity demand generated by the project. Waste source emissions generated by the proposed project include energy generated by land filling and other methods of disposal related to transporting and managing project generated waste. In addition, water source emissions associated with the proposed project are generated by water supply and conveyance, water treatment, water distribution, and wastewater treatment.

Following guidance from the YSAQMD, GHG emissions for operation of the project were calculated using CalEEMod. Based on the analysis results, summarized in **Table 4.8.A: Project Greenhouse Gas Emissions,** the proposed project would result in emissions of approximately 4,739.0 MT CO_2e per year. These estimated emissions are provided for informational purposes, and the significance of the proposed project is further analyzed below. CalEEMod output sheets are provided in **Appendix B** of this Draft EIR.

Table 4.8.A: Project Greenhouse Gas Emissions

Emission Type	Operational Emissions (Metric Tons per Year)			
	CO_2	CH_4	N_2O	CO_2e
Mobile Sources	4,181.0	0.2	0.2	4254.0
Area Sources	3.2	<0.1	<0.1	3.2
Energy Sources	408.6	0.1	<0.1	412.7
Water Sources	5.5	0.3	<0.1	15.0
Waste Sources	15.2	1.5	0.0	53.3
Total Annual Operational Emissions				**4,739.0**

Source: Compiled by LSA (May 2026).
CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent
N_2O = nitrous oxide

[18] 1,136 MT CO_2e/1.5 (18 months) =757.3 MT CO_2e per year

As discussed, the YSAQMD has not established a numeric threshold for GHG emissions. The significance of GHG emissions may be evaluated based on locally adopted quantitative thresholds or consistency with a regional GHG reduction plan (e.g., a Climate Action Plan). Therefore, consistent with the *State CEQA Guidelines*, Section 15183.5, if a project is consistent with an adopted qualified Greenhouse Gas Reduction Strategy, it can be presumed that the project would not have significant GHG emission impacts. The City's CAAP meets the requirements of *State CEQA Guidelines*, Section 15183.5; therefore, the proposed project is evaluated for consistency with the City's CAAP.[19] **Table 4.8.B: Proposed Project Consistency with the City's CAAP,** below presents the proposed project's consistency with the CAAP.

Table 4.8.B: Proposed Project Consistency with the City's CAAP

CAAP Actions	Consistency
Goal 2: Reimagine how we move people and goods	
Prioritize transit-oriented development and center/corridor community growth through land use planning	**Consistent.** The project site is an infill parcel surrounded by development to the north, west, and south, and is identified as an Established Communities area in the 2025 Blueprint Plan.[20] Development of the proposed project within an Established Communities area is consistent with the integrated land use planning decisions encouraged by the 2025 Blueprint Plan.
Allocate funding to expand and connect the active transportation and micro-mobility network	**Consistent.** The proposed project would construct local streets to facilitate circulation throughout the proposed residential development, all of which will be public and meet applicable City Standards. Generally, the proposed streets would accommodate 5- to 8-foot-wide sidewalks and Class III bikeways within the proposed development. As well as Class II bikeways along Marshall Road and Otis Avenue, and enhanced crosswalks with speed tables and bulb-outs.
Goal 3: Design a future with zero carbon power sources	
Enhance utility coordination and advocate for the City's utility provider to provide access to carbon-free electricity and additional building efficiency/retrofit rebates and funding	**Consistent.** PG&E would provide electricity for the project. In 2022, approximately 40 percent of PG&E's delivered electricity came from renewable sources, including solar, wind, geothermal, small hydroelectric and various forms of bioenergy.[21] PG&E reached California's 2020 renewable energy goal in 2017 and is positioned to meet the State's 60 percent by 2030 renewable energy mandate set forth in Senate Bill (SB) 100. In addition, PG&E plans to continue to provide reliable service to its customers and upgrade its distribution systems as necessary to meet future demand.

19 City of West Sacramento. 2025. *City of West Sacramento Climate Action and Adaptation Plan.* June 4. Website: https://www.cityofwestsacramento.org/home/showpublisheddocument/20579/638860179110630000 (accessed May 2026).

20 City of West Sacramento. 2025. *Blueprint 2025 A Strategy For the Future of the Sacramento Region*. Website: https://www.sacog.ca.gov/home/showpublisheddocument/3392/639124545029430000 (accessed July 2026).

21 Pacific Gas and Electric Company (PG&E). 2023. *Exploring Clean Energy Solutions*. Website: https://www.pge.com/ en/about/corporate-responsibility-and-sustainability/taking-responsibility/clean-energy-solutions.html (accessed February 2024).

Table 4.8.B: Proposed Project Consistency with the City's CAAP

CAAP Actions	Consistency
Incentivize local solar photovoltaic systems and enhanced energy storage, and promote participation in community solar programs	**Consistent**. The proposed residential units would feature passive use of solar heating and cooling, solar roofs, green roofs, or cool roof systems, and energy-efficient home appliances. In addition, future residents may elect to join a community solar program.
Goal 4: Plan for all-electric buildings city-wide	
Develop and adopt a building electrification program and incentives for existing buildings	**Not applicable**. No existing buildings are included as part of the project.
Establish energy performance standards and GHG emissions limits for existing commercial buildings	**Not applicable.** No existing buildings are included as part of the project. In addition, the proposed project is a single-family housing development and would not include commercial buildings.
Mandate all-electric new construction in a phased approach to eliminate on-site fossil fuel use	**Consistent.** The proposed project would be designed to be all-electric and would not include the use of natural gas.
Goal 5: Create a waste-free city	
Expand commercial and multifamily organic waste programs	**Not applicable.** The project is a single-family housing development and would not include multifamily units or commercial uses. However, the proposed project would be consistent with the CALGreen Code for residential and organic waste disposal. In addition, the proposed project would include green bins and trash enclosures for operational waste activities.
Expand the food recovery network to collect edible food from businesses	**Not applicable.** The project is a single-family housing development and would not include commercial uses.
Reduce unnecessary material consumption	**Consistent.** The proposed project would be consistent with County Solid Waste and State waste reduction requirements for the construction of the proposed project. In addition, the proposed project would include green bins and trash enclosures for operational waste activities.

Source: Compiled by LSA (May 2026).
Note: Not applicable refers to measures that are not relevant to new development and measures not within the Project Applicant's control.
PG&E = Pacific Gas & Electric

As shown in **Table 4.8.B,** the proposed project is consistent with applicable goals and CAAP actions of the City of West Sacramento's CAAP. Many of the CAAP goals and actions are the responsibility of the City and are not applicable to individual projects (i.e., land use planning decisions, funding, regional transit, etc.); however, the proposed project would be in track for meeting the CAAP goals related to transportation, carbon neutrality, and solid waste. The proposed project involves the subdivision of an approximately 60-acre property to create 259 lots for future single-family homes, comprising approximately 34.78 acres of residential development and 15 open space lots totaling 6.65 acres. The open space lots would include a 0.68-acre Central Park, a 0.14-acre parklet at the corner of Marshall Road and Otis Avenue, and 1.81 acres of landscaped lots, including a roundabout, distributed throughout the proposed development to provide greenspace and buffers. Additionally, the open space areas would include a 4.02-acre detention basin, which would also serve as a recreational field during dry seasons. These open space lots would encourage future residents and surrounding residential communities to use the open space for recreation and other daily activities within walking or biking distance of their homes. By providing accessible and attractive green spaces, the project reduces the need for residents to drive to distant parks or recreational facilities.

Therefore, the integration of these parks into the neighborhood design promotes active transportation by encouraging walking and biking within the project site. In addition, the project would include two new sidewalks, one along Marshall Road and another along Otis Avenue. The sidewalk along Marshall Road would provide direct, walkable access to a neighboring park located along Marshall Road, further encouraging non-vehicular travel for recreational purposes. Furthermore, Yolo Transportation District's Yolobus Route 37 runs down Marshall Road along the northern edge of the project site. A bus stop is located approximately 0.25 mile east of the project site on Marshall Road between Otis Avenue and Seymour Avenue. The close proximity of the bus stop would encourage and promote the use of active transit in the area. As described in the Project Location and Description Section, the proposed residential units would also feature passive use of solar heating and cooling, natural ventilation, energy-efficient windows (such as Low E Vinyl, Argon Glass Filled Low E, or Low E Wood Frame), solar roofs, green roofs, or cool roof systems, and energy-efficient home appliances. The proposed project would also be designed to be all-electric and will not include the use of natural gas. Therefore, the project is not expected to obstruct the attainment of the State's long-term GHG reduction goal for 2045. For these reasons, the proposed project would be consistent with the City's CAAP and would not generate GHG emissions that may have a significant effect on the environment. Therefore, project impacts related to the generation of greenhouse gas emissions would be **less than significant**.

Threshold 4.8.2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. An evaluation of the proposed project's consistency with the 2022 Scoping Plan and the SACOG's 2025 Blueprint Plan is provided below.

2022 Scoping Plan. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

The City's CAAP establishes GHG reduction goals consistent with State legislation.[22] The City's CAAP outlines a plan for how the City can prepare for climate change impacts while reducing GHG emissions to meet its 2030 and 2045 targets. The GHG goals and actions identified in the City's CAAP would enable the City to reduce its community GHG emissions by 392,070 MT CO_2e by 2030 and reach carbon neutrality by 2045. Furthermore, the strategies adopted in the City's CAAP have the ability, when fully implemented, to reduce GHG emissions below the City's 2030 GHG reduction target and make substantial progress toward a 2045 carbon neutrality target, consistent with State goals and legislature such as AB 1279. Therefore, the strategies, actions, and steps in this CAAP will create the basis for long-term carbon neutrality when implemented, including electrified buildings and vehicles coupled with decarbonized electricity, improved active transportation, decreased waste generation, and increased carbon sequestration.

[22] City of West Sacramento. 2025. *City of West Sacramento Climate Action and Adaptation Plan*. June 4. Website: https://www.cityofwestsacramento.org/home/showpublisheddocument/20579/638860179110630000 (accessed May 2026).

As discussed in the preceding section and in Table 4.8.B, the proposed project would be consistent with the goals outlined in the CAAP. While many of the implementing actions will be the responsibility of the City, the project would still be in track with meeting all the applicable actions and will contribute to the City's GHG reduction goals for 2030 and 2045. Therefore, because the City's CAAP is designed to meet the State's established GHG reduction goals, including the 2022 Scoping Plan goals, then an agency reviewing the project under CEQA can conclude that the project would be consistent with the State's 2022 Scoping Plan. The proposed project would be contributing its "fair share" of emissions reductions to support long-term State goals of GHG emission reductions and carbon neutrality and would therefore be found to be consistent with regional and State goals and applicable plans for GHG emissions reductions.

SACOG's 2025 Blueprint Plan. The 2025 Blueprint Plan [23] lays out a transportation investment and land use strategy to support a prosperous region, with access to jobs and economic opportunity, transportation options, and affordable housing that works for all residents. The plan also lays out a path for improving air quality, preserving open space and natural resources, and helping California achieve its goal to reduce greenhouse gas emissions that contribute to climate change. The vision, goals, and policies in the 2025 Blueprint Plan are intended to serve as the foundation for both short- and long-term planning and guide implementation activities. The 2025 Blueprint Plan contains policies for projects to help more efficiently distribute population, housing, and employment growth, as well as forecast development that is generally consistent with regional-level general plan data. Some actions are intended to support the Sustainable Communities Strategy and reduce GHG emissions directly, while others are focused on the MTP's broader goals. The 2025 Blueprint Plan does not require that local General Plans, Specific Plans, or zoning be consistent with the 2025 Blueprint Plan, but provides incentives for consistency for governments and developers.

The proposed project would not involve more than 500 dwelling units and, therefore, is not regionally significant per *State CEQA Guidelines* Section 15206(b)(2)(A). Accordingly, it would not conflict with the 2025 MTP/SCS targets since those targets were established and are applicable on a regional level. The City's 2021-2029 Housing Element Update reports 2.8 residents per household in West Sacramento;[24] therefore, the development of 259 residential estates could house approximately 725 residents. The City Housing Element estimates that the city will grow to 87,999 residents by 2040, an increase of 65 percent from the 2016 baseline. Correspondingly, the number of households is also projected to increase by 84 percent in the city and 34.3 percent in the county overall. Thus, the additional 725 new residents necessitated by the proposed project would represent approximately 0.8 percent of the projected 2040 population.[25]

Furthermore, on March 19, 2020, the SACOG Board of Directors adopted the Cycle 6 (2021–29) Regional Housing Needs Plan which provides the number of total housing units that each jurisdiction

[23] Sacramento Area Council of Governments (SACOG). 2025. *2025 Blueprint.* Website: https://www.sacog.org/planning/2025-blueprint/2025-blueprint-plan (accessed June 2026).

[24] City of West Sacramento. 2021. *2021-2029 Housing Element Update,* Table A-6. Website: https://www.cityofwestsacramento.org/home/showpublisheddocument/12221/637619619413930000 (accessed May 2026).

[25] (725 persons from the proposed project/ 87,999 2040 projected population) x 100 = 0.8 percent of total 2040 population

in the SACOG region must zone for during the 8-year period. According to the adopted Regional Housing Needs Assessment (RHNA) methodology, West Sacramento's housing need allocation for the planning period between 2021 and 2029 is 9,471 units (2,287 very low-income units, 1,378 low-income units, 1,722 moderate-income units, and 4,084 Above Moderate).[26] Therefore, the total RHNA for the City of West Sacramento would be less than the projected housing growth included in the 2025 Blueprint Plan, which projects an increase of 15,880 housing units from 2020 to 2050.[27]Accordingly, the additional 259 new units would represent approximately 1.6 percent of the anticipated housing growth from 2020 to 2050 in the SACOG 2025 Blueprint Plan, and would help to meet the City's identified housing needs.[28] Therefore, the proposed project would be consistent with the regional growth assumptions established in the 2025 Blueprint. Furthermore, as noted in the 2025 Blueprint Plan, regional VMT can be reduced through integrated land use and transportation planning. For example, high-density, mixed-use, and infill development results in shorter trip lengths for residents. The project site is an infill parcel surrounded by development to the north, west, and south, and is identified as an Established Communities area in the 2025 Blueprint Plan. Development of the proposed project within an Established Communities area is consistent with the integrated land use planning decisions encouraged by the 2025 Blueprint Plan.

Therefore, the project would not conflict with the regional growth projections and the growth projections used to develop the CARB's 2022 Scoping Plan and the SACOG's 2025 Blueprint Plan. Accordingly, the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, including the CARB Scoping Plan and the SACOG's 2025 Blueprint Plan and impacts would be **less than significant**.

4.8.7 Cumulative Impacts

Less Than Significant Impact. GHG impacts are by their nature cumulative impacts. Localized impacts of climate change are the result of the cumulative impact of global emissions. The combined benefits of reductions achieved by all levels of government help to slow or reverse the growth in GHG emissions. In the absence of comprehensive international agreements on appropriate levels of reductions achieved by each country, another measure of cumulative contribution is required. This serves to define the State's share of the reductions regardless of the activities or lack of activities of other areas of the U.S. or the world. Therefore, a cumulative threshold based on consistency with State targets and actions to reduce GHGs is an appropriate standard of comparison for significance determinations. The thresholds developed by the YSAQMD are based on and apply to individual projects. Since climate change is a global issue, it is unlikely that individual projects would generate enough GHG emissions to influence climate change on their own. Consequently, it is speculative to determine how an individual project's GHG emissions would impact climate change in California. Impacts identified under the Greenhouse Gas Impacts Section, are not project-specific impacts to

[26] Sacramento Area Council of Governments (SACOG). 2020. *SACOG Regional Housing Needs Plan.* Cycle 6 (2021-2029). Adopted March 2020. Website: https://www.sacog.org/home/showpublisheddocument/370/638218262676300000 (accessed May 2026).

[27] Sacramento Area Council of Governments (SACOG). 2025. *2025 Blueprint (MTP/SCS)* Appendix C – *Land Use Forecast.* Website: https://www.sacog.ca.gov/home/showpublisheddocument/3297/638975101112800000 (accessed May 2026).

[28] (259 units from the proposed project / 15,880 total projected housing growth) × 100 = 1.6 percent of total projected housing growth

global climate change but are the proposed project's contribution to this cumulative impact. The proposed project's emissions are estimated to be 4,739.0 MT CO_2e per year; however, the YSAQMD has not established a numeric threshold for GHG emissions. As detailed under Threshold 4.8.1 above, the significance of GHG emissions may be evaluated based on locally adopted quantitative thresholds or consistency with a regional GHG reduction plan (e.g., a Climate Action Plan). As shown above in **Table 4.8.B**, the proposed project is consistent with applicable goals and CAAP actions of the City's CAAP. Therefore, environmental impacts related to GHG emissions and global climate change would not be cumulatively considerable under CEQA. The proposed project, in conjunction with other cumulative projects, would be subject to all applicable regulatory requirements, which would further reduce GHG emissions. Moreover, because GHG impacts are cumulative by nature the project would have a **less than significant cumulatively considerable impact**.

4.8.8 Level of Significance Prior to Mitigation

The proposed project would have less than significant impacts related to the generation of GHG emissions and conflicts with an applicable GHG reduction plan, policy, or regulation.

4.8.9 Regulatory Compliance Measures and Mitigation Measures

4.8.9.1 Regulatory Compliance Measures

There are no regulatory compliance measures applicable to the proposed project pertaining to GHG emissions.

4.8.9.2 Mitigation Measures

There are no mitigation measures applicable to the proposed project pertaining to GHG emissions.

4.8.10 Level of Significance after Mitigation

The proposed project would have less than significant impacts related to the generation of GHG emissions and conflicts with an applicable GHG reduction plan, policy, or regulation.

4.9 HAZARDS AND HAZARDOUS MATERIALS

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for the proposed Brar Farms Residential Development Project (proposed project) to impact hazards and hazardous materials in the City of West Sacramento (City). This section is based in part on the Phase I Environmental Site Assessment (ESA)[1] that was prepared for the proposed project and included in this Draft EIR (see **Appendix F)**, as well as on information provided by the West Sacramento Fire Department (WSFD), and the City's Emergency Operations Plan (EOP).

4.9.1 Scoping Process

Several comments received during the scoping period addressed hazards and hazardous materials. These comments raised concerns about the project's effect on emergency evacuation during a flooding or wildfire emergency, and the potential release of hazardous materials from the project site's history of agricultural use. A comment received from the California Department of Conservation's California Geologic Energy Management Division (CalGEM) identified an abandoned gas/oil well on the project site.

4.9.2 Methodology

The analysis of the potential for impacts associated with hazards and hazardous materials is based on the site-specific Phase I ESA completed for the proposed project. The Phase I ESA was prepared in 2021, at which time structures still existed on the project site and were identified during the site reconnaissance. Since the preparation of the Phase I ESA, these structures have been demolished. However, the conclusions of the report remain valid for purposes of the analysis provided in this section of the Draft EIR. The Phase I ESA was prepared in accordance with the requirements of the ASTM (American Society for Testing and Materials) E1527-13, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.* The Phase I ESA included review of information provided by the project applicant, review of general geology, hydrology, and topography of the project site, review of environmental records and databases, an investigation of historical use of the project site, interviews with the property owner, past occupants, and regulatory agencies, and an on-site reconnaissance of the project site and adjacent properties. In determining the level of significance, the analysis assumes that construction and operation of the proposed project would comply with relevant federal, State, and local laws and regulations pertaining to the transport, use, storage, and disposal of hazardous materials.

The Phase I ESA evaluates the project site for potential Recognized Environmental Conditions (RECs), Controlled Recognized Environmental Conditions (CRECs), and Historical Recognized Environmental Conditions (HRECs) that may be present, off-site conditions that may impact the subject property, and/or conditions indicative of releases or threatened releases of substances on, at, in, or to the project site. ASTM International defines RECs as "(1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of

[1] Partner Engineering and Science, Inc. 2021. *Phase I Environmental Site Assessment Report.*

a future release to the environment." Similarly, a CREC is a past REC that has been addressed to the satisfaction of the applicable regulatory authority with the use of required controls, while an HREC is a past REC that has been addressed to the satisfaction of the applicable regulatory authority without the use of required controls.

4.9.3 Existing Environmental Setting

4.9.3.1 Project Site History

In its existing condition, the project site is undeveloped and relatively flat with a gentle slope toward the southwest. Site elevations along the property range from approximately 8 to 10 feet above mean sea level. Although the project site primarily consists of loose disced soil from previous tilling activities, small patches of vegetation are present mainly along the northern edge of the site that consist of volunteer weeds and annual grasses. The areas surrounding the project site consist of a mix of land uses, including agricultural and residential. The project site was the previous location of H&H Nishimura Farms and was historically used for agricultural purposes. Eight buildings associated with H&H Nishimura Farms previously stood on the project site but have since been demolished. The project site is currently undeveloped and unoccupied. However, the project site is seasonally farmed for hay by a volunteer farmer and maintained by the property owner, who mows and tills the land as needed.[2]

4.9.3.2 Site Reconnaissance

The Phase I ESA identified two RECs at the project site. At the time of the site assessment, the project site was occupied by buildings associated with H&H Nishimura Farms. The Phase I ESA identified several drums and containers of oil and petroleum products in and around the buildings, along with minor oil staining, debris piles, and a partially buried 55-gallon drum on the site. The Phase I ESA could not rule out the presence of other buried drums, tanks, or other potential hazardous substances beneath the project site, and identified this as a REC. Although the Phase I ESA identified a REC at the project site associated with former buildings, the structures have since been demolished and would not pose a potential risk of asbestos-containing materials (ACMs) or lead-based paint. In addition, no underground storage tanks (USTs) were observed during the site reconnaissance. However, the previous agricultural uses on the site suggest the potential that agricultural related chemicals such as pesticides, herbicides, and fertilizers may have been used and stored on site. Based on the information above, the Phase I ESA concluded that the possible former use of agricultural chemicals would be considered a REC.

4.9.3.3 Regulatory Record Reviews

Available government database information prepared by Environmental Risk Information Services (ERIS) was reviewed to evaluate both the project site and listed sites within ASTM-recommended search distances. This included ASTM Standard federal, State, and tribal databases and local lists.

Neither the subject property nor adjacent properties were listed in the federal, State, and tribal databases. However, the project site was identified in Non-ASTM databases. The project site is listed on the Hazardous Waste Information System (HAZNET) database as having manifested hazardous

[2] Project Applicant. 2025. Bi-weekly Meeting. Personal communication with LSA. March 26.

waste in 2006. Additionally, H&H Nishimura Farms is also listed on the Certified Unified Program Agency (CUPA) YOLO database as an inactive hazardous material/hazardous waste regulated facility under the oversight of the Yolo County Environmental Health Department (YCEHD). An adjacent property, Bridgeway Lakes North, located approximately 0.2 mile west of the project site, was listed on the Envirostor database, indicating elevated concentrations of lead. The Phase I ESA noted that this listing does not represent a significant environmental concern. In addition, records indicate that a natural gas exploration well operated by Mobil Oil Exploration & Production North American, Inc. (Well No. 0411320081) is located on the northeastern side of the project site. According to CalGEM, as of April 2018, the well was plugged and abandoned. Please refer to Section 4.9.3.4, below, for additional details.

4.9.3.4 Oil, Gas, and Methane

The entirety of the project site is located within the now abandoned Greens Lake Gas Field. According to CalGEM, one dry-hole oil and gas well (American Petroleum Institute [API] No. 0411320081, Nishimura 1) is located in the northeastern portion of the project site, approximately 80 feet south of Marshall Road. Per CalGEM records, the well spud date (i.e., the date the well was first drilled) was November 3, 1969. The well was ultimately drilled to a depth of 5,000 feet and was never put into production. Records indicate that the well, owned by Mobil Oil Exploration & Production North America, Inc., was plugged and abandoned on November 10, 1969. While records show that there are wells located to the southwest in the Bridgeway Lakes neighborhood and to the northwest, there are no other oil or gas wells identified within the project site.[3]

4.9.3.5 Schools

There are no existing or planned schools within a 0.25-mile radius of the project site. The closest school to the project site is the Bridgeway Island Elementary School at 3255 Half Moon Bay Circle, which is located approximately 0.40 mile north of the project site.

4.9.3.6 Airports

The nearest public airports to the project site is the Sacramento Executive Airport located approximately four miles southeast of the project site and the Sacramento International Airport (SMF), located approximately 10 miles north of the project site. Per the *Sacramento Executive Airport Comprehensive Land Use Plan* and the *Sacramento International Airport Land Use Compatibility Plan*, the project site is located outside the Airport Influence Areas and Airport Compatibility Zones for both airports.[4,5]

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3 California Geologic Energy Management Division (CalGEM). 2018. *WellStar. Well Detail.* Website: https://wellstar-public.conservation.ca.gov/Well/Well/Detail?api=0411320081 (accessed February 2026).

4 Airport Land Use Commission for Sacramento, Sutter, Yolo, and Yuba Counties. 1998. *Sacramento Executive Airport. Comprehensive Land Use Plan*. Amended May 1999.

5 Airport Land Use Commission for Sacramento, Sutter, Yolo, and Yuba Counties. 2013. *Sacramento International Airport Land Use Compatibility Plan*.

The nearest airport to the project site is the California Highway Patrol (CHP) Academy Heliport, located approximately four miles to the north of the project site; however, the CHP Academy Heliport is not a public or public use airport.

4.9.4 Regulatory Setting

Federal, State, and local regulations and programs related to hazards and hazardous materials that are applicable to the proposed project are described below.

4.9.4.1 Federal Regulations

Comprehensive Environmental Response, Compensation, and Liability Act. The discovery of environmental health damage from disposal sites prompted the U.S. Congress to pass the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund). The purpose of the CERCLA is to identify and clean up chemically contaminated sites that pose a significant environmental health threat. The Hazard Ranking System is used to determine whether a site should be placed on the National Priorities List for cleanup activities.

14 Code of Federal Regulations (CFR) Part 77. The Federal Aviation Administration (FAA) is the agency responsible for management of the national airspace. In furtherance of this role, the FAA has promulgated regulations at 14 CFR Part 77 for the safe, efficient use, and preservation of navigable airspace. These regulations establish requirements for providing notice to the FAA of proposed construction in areas around airports; establish standards for determining whether objects constructed near airports will be considered obstructions in navigable airspace including delineating imaginary airspace surfaces for airports; provides the process by which the FAA will prepare aeronautical studies to determine the potential impacts of a structure on the operation of aircraft through navigable airspace; and establishes the process to petition the FAA for discretionary review of its aeronautical study determinations.

Superfund Amendments and Reauthorization Act. The Superfund Amendments and Reauthorization Act (SARA) pertains primarily to emergency management of accidental releases. It requires formation of State and local emergency planning committees, which are responsible for collecting, material handling, and transportation data for use as a basis for planning. Chemical inventory data are made available to the community at large under the “right-to-know” provision of the law. In addition, SARA also requires annual reporting of continuous emissions and accidental releases of specified compounds. These annual submissions are compiled into a nationwide Toxics Release Inventory (TRI).

Resource Conservation and Recovery Act. The Resource Conservation and Recovery Act (RCRA) Subtitle C addresses hazardous waste generation, handling, transportation, storage, treatment, and disposal. It includes requirements for a system that uses hazardous waste manifests to track the movement of waste from its site of generation to its ultimate disposition. The 1984 amendments to the RCRA created a national priority for waste minimization. Subtitle D establishes national minimum requirements for solid waste disposal sites and practices. It requires states to develop plans for the management of wastes within their jurisdictions. Subtitle I requires monitoring and containment systems for underground storage tanks that hold hazardous materials. Owners of tanks must demonstrate financial assurance for the cleanup of a potential leaking tank.

United States Department of Transportation (USDOT) Regulations, Title 49 CFR (Hazardous Materials Transportation Act). The Hazardous Materials Transportation Act is the statutory basis for the extensive body of regulations aimed at ensuring the safe transport of hazardous materials on water, rail, highways, in the sky, or in pipelines. It includes provisions for materials classification, packaging, marking, labeling, placarding, and shipping documentation.

Occupational Safety and Health Administration (OSHA), Title 29 CFR. OSHA is the federal agency responsible for ensuring worker safety. These regulations provide standards for safe workplaces and work practices, including those relating to hazardous materials handling.

United States Environmental Protection Agency (United States Environmental Protection Agency [USEPA]), Title 40 CFR Parts 700–799 (Toxic Substances Control Act). The Toxic Substances Control Act regulates manufacturing, inventory, and disposition of industrial chemicals, including hazardous materials. It addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls, asbestos-containing materials, and lead-based paint.

Clean Water Act. National Pollutant Discharge Elimination System (NPDES) (Clean Water Act Section 402[p]) (33 United States Code [USC] § 342[p]). Regulates discharges and spills of pollutants, including hazardous materials to surface waters and groundwater. The Clean Water Act (CWA) requires states to adopt water quality standards for water bodies and have those standards approved by the USEPA. Water quality standards consist of designated beneficial uses for a particular water body (e.g., wildlife habitat, agricultural supply, fishing), along with water quality criteria necessary to support those uses. Water quality criteria are set concentrations or levels of constituents (e.g., lead, suspended sediment, and fecal coliform bacteria) or narrative statements that represent the quality of water that support a particular use. Because California had not established a complete list of acceptable water quality criteria for toxic pollutants, USEPA Region IX established numeric water quality criteria for toxic constituents in the form of the California Toxics Rule (CTR).

The Safe Drinking Water Act. The Safe Drinking Water Act (42 USC § 300(f) et seq.) regulates discharges of pollutants to underground aquifers and establishes standards for drinking water quality.

4.9.4.2 State Regulations

California Code of Regulations (CCR). Most State and federal regulations and requirements that apply to generators of hazardous waste are spelled out in the CCR, Title 22, Division 4.5. Title 22 contains the detailed compliance requirements for hazardous waste generators, transporters, treatment, storage, and disposal facilities. Because California is a fully authorized State according to RCRA, most RCRA regulations (those contained in 40 CFR 260, et seq.) have been duplicated and integrated into Title 22. However, because the California Department of Toxic Substances Control (DTSC) regulates hazardous waste more stringently than the USEPA, the integration of California and federal hazardous waste regulations that make up Title 22 do not contain as many exemptions or exclusions as does 40 CFR 260. As with the Health and Safety Code (HSC), Title 22 also regulates a wider range of waste types and waste management activities than do the RCRA regulations in 40 CFR 260. To aid the regulated community, California has compiled the hazardous materials, waste and

toxics-related regulations contained in CCR, Titles 3, 8, 13, 17, 19, 22, 23, 24, and 27 into one consolidated CCR, Title 26 "Toxics." However, the California hazardous waste regulations are still commonly referred to as Title 22. For the purposes of clarity, because of the extensive reach of Title 22 and Title 26, many common household products sold in grocery stores and home improvement warehouses qualify as hazardous materials. These items include household cleaners, detergents, paint, motor oil, lubricants, glues, pesticides, etc. The term "hazardous materials" is also defined to include many on site materials as well, such as lubricants, fuel, etc. Thus, when this section of the EIR discusses the transport and storage of "hazardous materials," it is referring to the potential transport of bulk products to the project locations and to the temporary storage of such materials at the project sites prior to their re-packaging and transport to subsequent destinations.

Assembly Bill (AB) 2948. In response to the growing statewide concern of hazardous waste management, AB 2948 enacted legislation authorizing local governments to develop comprehensive hazardous waste management plans. The intent of each plan is to ensure that adequate treatment and disposal capacity is available to manage the hazardous wastes generated within its jurisdiction.

California State Hazard Mitigation Plan. The purpose of the State Hazard Mitigation Plan (SHMP) is to significantly reduce deaths, injuries, and other losses attributed to natural and human-caused hazards in California. The SHMP provides guidance for hazard mitigation activities emphasizing partnerships among local, State, and federal agencies as well as the private sector.

Cortese List: Section 65962.5(a). Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to develop at least annually an updated Hazardous Waste and Substances Sites list (Cortese List). The Cortese List is a planning document used by the State, local agencies, and developers to comply with the California Environmental Quality Act (CEQA) requirements in providing information about the locations of hazardous materials release sites. Release sites or hazardous materials release sites may include the following:

- All hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code.
- All land designated as hazardous waste property or border zone property pursuant to Article 11 (commencing with Section 25220) of Chapter 6.5 of Division 20 of the Health and Safety Code.
- All information received by the Department of Toxic Substances Control pursuant to Section 25242 of the Health and Safety Code on hazardous waste disposals on public land.
- All sites listed pursuant to Section 25356 of the Health and Safety Code.
- All sites included in the Abandoned Site Assessment Program.

The Department of Toxic Substance Control (DTSC) is responsible for a portion of the information contained in the Cortese List. Other State and local government agencies are required to provide additional hazardous material release information for the Cortese List.

California Occupational Safety and Health Administration (Cal/OSHA) Regulations. Cal/OSHA is responsible for developing and enforcing workplace safety standards and ensuring worker safety in the handling and use of hazardous materials. Among other requirements, Cal/OSHA requires many entities to prepare injury and illness prevention plans and chemical hygiene plans and provides specific regulations to limit exposure of construction workers to lead.

California Office of Environmental Health Hazard Assessment. The California Office of Environmental Health Hazard Assessment (OEHHA) is administered by CalEPA to protect and enhance public health and the environment by scientific evaluation of risks posed by hazardous substances. The OEHHA developed California Human Health Screening Levels (CHHSL)[6] on behalf of the CalEPA pursuant to Health and Safety Code Section 57008 to establish thresholds of chemical concentrations of concern for risks to human health, specifically, an excess of lifetime cancer risk of one-in-a-million (10^{-6}) and a hazard quotient of 1.0 for non-cancer health effects. It should be noted that CHHSL have no regulatory effect and are not intended for use by regulatory agencies that have authority to require remediation of contaminated soil. The numbers are solely advisory and published as reference values for use by citizen groups, community organizations, property owners, developers, and local government officials to estimate the degree of effort that may be necessary to remediate a contaminated site.

The Porter-Cologne Water Quality Control Act (California Water Quality Code, Section 13000 et seq.). The Porter-Cologne Water Quality Control Act regulates water quality through the State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards, including oversight of water monitoring and contamination cleanup and abatement.

Safe Drinking Water and Toxic Enforcement Act The Safe Drinking Water and Toxic Enforcement Act is similar to the Federal Safe Drinking Water Act and Clean Water Act in that it regulates the discharge of contaminants to groundwater.

California Emergency Services Act. Government Code Sections 8550–8692 provide for the assignment of functions to be performed by various agencies during an emergency so that the most effective use may be made of all manpower, resources, and facilities for dealing with any emergency that may occur. The coordination of all emergency services is recognized by the State to mitigate the effects of natural, man-made, or war-caused emergencies that result in conditions of disaster or extreme peril to life, property, and the resources of the State, and generally, to protect the health and safety and preserve the lives and property of the people of the State.

California Government Code Section 51178. This government code requires the State Fire Marshal to identify areas in the State as moderate, high, and very high fire hazard severity zones based on consistent statewide criteria and based on the severity of fire hazard that is expected to prevail in those areas. Moderate, high, and very high fire hazard severity zones shall be based on fuel loading,

[6] California Office of Environmental Health Hazard Assessment (OEHHA). 2010. California Human Health Screening Levels. September 23, 2010. Website: https://oehha.ca.gov/risk-assessment/california-human-health-screening-levels-chhsls (accessed July 8, 2024).

slope, fire weather, and other relevant factors including areas where winds have been identified by the Office of the State Fire Marshal as a major cause of wildfire spread.

California Senate Bill (SB) 12. This regulation establishes new rules for construction of industrial, commercial, and residential projects to improve fire safety and prevention. These regulations apply to building materials that are more fire-resistant and defensible space incorporated into the design of projects.

California SB 1137. SB 1137 enacted in September 2022, establishes a 3,200-foot Health Protection Zone (HPZ) around sensitive sites such as homes, schools, hospitals, and parks. Within these zones, the law prohibits the drilling of new oil and gas wells and imposes stricter safety and environmental regulations on existing operations. A key provision of the legislation is the creation of the HPZ, which is established around sensitive receptors, including residences, schools, healthcare facilities, and community centers. Within these zones, new oil and gas wells are prohibited, and existing operations are subject to submit annual inventories to CalGEM to enhance transparency and safeguard communities near drilling sites.

4.9.4.3 Regional Regulations

Certified Unified Program Agency. SB 1082 provides for the designation of a Certified Unified Program Agency (CUPA) that would be responsible for the permitting process and collection of fees regarding hazardous materials. The CUPA would be responsible for implementing at the local level the Unified Program, which serves to consolidate, coordinate, and make consistent the administrative requirements, permits, inspections, and enforcement activities for the following environmental and emergency management programs: Aboveground Petroleum Storage Act (APSA); California Accidental Release Prevention (CalARP); California Environmental Reporting System (CERS); Hazardous Materials; Hazardous Materials Emergency Response; Hazardous Waste Generators; Injection of Petroleum Waste; On-site Hazardous Waste Treatment; Underground Storage Tank (UST); and Waste Tire Programs.

The Yolo County Environmental Health Department (YCEHD) is designated as the CUPA for the City of West Sacramento, and coordinates the regulation of hazardous materials and hazardous waste in the City of West Sacramento for construction and operational activities through the following programs:

- Aboveground Petroleum Storage Act (APSA)
- California Accidental Release Prevention (CalARP)
- California Environmental Reporting System (CERS)
- Hazardous Materials
- Hazardous Materials Emergency Response
- Hazardous Waste Generators
- Injection of Petroleum Waste
- On-site Hazardous Waste Treatment
- Underground Storage Tank (UST)
- Waste Tire Program

County of Yolo Multi-Jurisdictional Hazard Mitigation Plan (2023). Adopted in December 2023, this plan defines measures to reduce risks from natural disasters in the Yolo County planning area, including unincorporated areas, incorporated cities, and special purpose districts. The 2023 plan updates the County's previous plan, the 2018 Yolo County Multi-Hazard Mitigation Plan and identifies risks and vulnerabilities, establishes hazard mitigation strategies, describes emergency organization, task assignments, and general procedures, and provides for coordination of response in the event of an emergency.

4.9.4.4 Local Regulations

Annex D: City of West Sacramento (2023). This plan is a support annex to the Yolo County Multijurisdictional Hazard Mitigation Plan. The annex details the hazard mitigation planning elements specific to the City of West Sacramento, a previously participating jurisdiction to the 2018 Yolo County Multi-Jurisdictional Hazard Mitigation Plan and provides additional details on the risk assessment and mitigation strategy for this community.

City of West Sacramento Municipal Code. The following City of West Sacramento Municipal Code sections are relevant to hazards and hazardous materials:

- **Chapter 8.18** of the City of West Sacramento Municipal Code addresses hazardous materials. The intent of this chapter is to establish the city as the administering agency for the hazardous materials program.

- **Chapter 17.28.090** of the City of West Sacramento Municipal Code addresses hazardous and extremely hazardous materials. The intent of this chapter is to provide basic information on the permit requirements involving projects using hazardous and extremely hazardous materials.

City of West Sacramento General Plan 2035. The Safety Element of the West Sacramento 2035 General Plan contains the following applicable goals, policies, and actions related to hazards and hazardous materials:

- **Goal S-1:** To ensure that City emergency response procedures are adequate in the event of natural or man-made disasters.

    - **Policy S-1.5:** The City shall maintain a complete system of emergency evacuation routes and ensure that they are kept free of impediments.

    - **Policy S-1.6:** The City shall ensure that emergency access is an integral part of the design of all new development.

    - **Policy S-1.12:** The City shall require that roadway systems for areas protected from flooding by levees be designed to provide multiple escape routes for residents and access for emergency services in the event of a levee or dam failure.

    - **Policy S-1.13:** The City shall maintain, implement, update, and make available to the public the local Comprehensive Flood Management Plan, Emergency Plans, and Evacuation Plans, which address emergency preparedness, evacuation, hazardous materials, and protection of

critical facilities, development guidelines, and flood insurance outreach to better protect citizens in the event of a major flood event.

- **Goal S-6:** To minimize exposure to the potentially harmful effects of hazardous materials and waste on West Sacramento residents.
    - **Policy S-6.1**: The City shall regulate the use, storage, manufacture, transport, and disposal of hazardous materials and waste in accordance with Federal, State, and local regulations. The City shall maintain additional standards addressing the transport of hazardous materials within the city, which can include restricting transport to designated routes.
    - **Policy S-6.2:** The City shall prohibit the parking of vehicles transporting hazardous materials on City streets.
    - **Policy S-6.5:** The City shall require the necessary level of environmental review for development applications to ensure soils, groundwater, and buildings affected by hazardous materials would not affect the environment or health of future property owners or users.
    - **Policy S-6.8:** The City shall require businesses and property owners of known hazardous material contamination and waste sites to coordinate with local, State, and/or appropriate Federal agencies to develop and implement a plan to investigate, facilitate, and manage the remediation of known sites.
    - **Policy S-6.9:** The City shall provide opportunities for residents to conveniently and responsibly dispose of household hazardous and medical waste to protect the safety of residents and health of the environment.

City of West Sacramento Emergency Operations Plan (EOP). The EOP was developed for City agencies with emergency services responsibilities and establishes an Emergency Management Organization for the City. This allows for integration and coordination of emergency planning efforts for multiple City agencies. The EOP serves as an extension of the Yolo County EOPs and the California Emergency Plan.

4.9.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the proposed project would have a significant adverse impact with respect to hazards and hazardous materials if it would:

Threshold 4.9.1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;

Threshold 4.9.2: Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;

Threshold 4.9.3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;

Threshold 4.9.4: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, it would create a significant hazard to the public or the environment;

Threshold 4.9.5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area;

Threshold 4.9.6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or

Threshold 4.9.7: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

4.9.6 Project Impacts

Threshold 4.9.1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Generally, hazardous materials are chemicals that could cause harm during an accidental release or mishap, and are defined as being toxic, corrosive, flammable, reactive, and an irritant, or strong sensitizer.[7] Hazardous substances include all chemicals regulated under the United States Department of Transportation's "hazardous materials" regulations and the United States Environmental Protection Agency (USEPA) "hazardous waste" regulations. Hazardous waste requires special handling and disposal because of their potential to damage public health and the environment. The probable frequency and severity of consequences from the routine transport, use, or disposal of hazardous materials is affected by the type of substance, the quantity used or managed, and the nature of the activities and operations.

The proposed project would develop an approximately 60-acre subdivision consisting of 259 lots for future single-family homes and 15 open space lots. Of the proposed residential lots, 242 would range from 5,000 to 8,400 net square feet, and seventeen of the proposed residential lots would be oversized lots reaching up to 14,800 net square feet. In addition, landscaping, roadway, and utility improvements would be installed within the project site. Additionally, the proposed project would require a General Plan Amendment (GPA) to the City's General Plan, an amendment to the Southport Framework Plan to change the designations from Rural Estate (RE) to Low Density Residential (LR), and rezoning of the project site from Residential Rural Estates (RE) to Residential One Family (R-1-A). Because the proposed project involves a residential subdivision it would generally not involve transport, use, or disposal of significant quantities of hazardous materials.

[7] A "sensitizer" is a chemical that can cause a substantial proportion of people or animals to develop an allergic reaction in normal tissue after repeated exposure to a chemical.

Construction of the proposed project would require the short-term transport, use, and/or disposal of petroleum-based fuels, lubricants, pesticides, and other similar materials required for construction. The routine transport, use, and/or disposal of these hazardous materials could pose a potential hazard to construction workers working at the project site as they would be handling the hazardous materials and could therefore be exposed through inhalation of vapors, direct contact with skin, or accidental ingestion. However, construction activities would be required to comply with applicable State and federal regulations for proper transport, use, storage, and disposal of excess hazardous materials and hazardous construction waste.

Project operations may also require regular transport, use, and/or disposal of small quantities of hazardous materials (e.g., fertilizers, and pesticides). Because residents are not anticipated to use, store, dispose or transport large volumes of hazardous materials, residential uses typically do not present a hazard associated with the accidental release of hazardous substances into the environment. Hazardous substances associated with residential uses are typically limited in both amount and use, and they can be contained without impacting the environment. Additionally, it is assumed that such materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations.

The policies included in the City's General Plan Safety Element, discussed in Section 4.9.4, establish the framework for addressing public safety hazards, including those related to hazardous materials. Additionally, the WSFD's Community Risk Reduction Division[8] and the Yolo County Environmental Health Division[9] serve as the primary agencies overseeing hazardous materials management within the City. The County's Multi-Jurisdictional Hazard Mitigation Plan would ensure that adequate treatment and disposal capacity is available to manage the hazardous waste generated within the County and address issues related to the disposal, handling, processing, storage, and treatment of local hazardous materials and waste products.

Transport, storage, and use of hazardous materials associated with the proposed project would be subject to all applicable federal, State, and local laws and regulations, including the USEPA for hazardous waste and materials management under the Resource Conservation and Recovery Act (RCRA); the U.S. Department of Transportation (USDOT) for the classification, packaging, labeling, and transport of hazardous materials under the Hazardous Materials Transportation Act; the Occupational Safety and Health Administration (OSHA) and California Occupational Safety and Health Administration (Cal/OSHA) for worker safety; the California Department of Toxic Substances Control (DTSC) for hazardous waste and site management; the Health and Safety Code (HSC) for hazardous materials storage, handling, and disposal requirements; and California Code of Regulations (CCR), Titles 8 and 22, for workplace safety and hazardous waste standards. Compliance

8 City of West Sacramento. n.d. *Fire. Hazardous Materials Program*. Website: https://www.cityofwestsacramento.org/government/departments/fire/community-risk-reduction/hazardous-materials-program (accessed February 2026).

9 Yolo County Environmental Health Division. n.d. *Hazardous Materials Business Plan and Inventory Program*. Yolo County Government. Website: https://www.yolocounty.gov/government/general-government-departments/community-services/environmental-health-division/hazardous-materials-programs/hazardous-materials-program (accessed February 2026).

with these regulations would ensure that the proposed project does not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, as these materials would be properly handled during construction and operation. Therefore, this impact would be **less than significant**, and no mitigation is required.

Threshold 4.9.2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant with Mitigation Incorporated. There are two main ways that the public and/or the environment could be affected by the release of hazardous materials from the project site: (1) exposure of workers and/or the public to potentially contaminated soil and groundwater during construction and/or operation of the project; or (2) exposing workers and/or the public to hazardous building materials (e.g., lead paint, asbestos) during demolition of existing structures. As the structures on the project site have been demolished and removed, it is assumed that the primary means of exposure would arise from exposure to contaminated soil and/or groundwater during construction and or operation of the public.

According to the Phase I ESA prepared for the project (see **Appendix F)**, two RECs were identified: (1) the site's historical agricultural use from 1937 through 2016, during which pesticides, herbicides, and fertilizers may have been applied or stored on site, creating the potential for residual chemicals in the soil; and (2) the presence of a partially buried 55-gallon drum of unknown contents near the former building in the northern portion of the site, which could have released contaminants to the soil. Although all onsite buildings and septic systems have since been demolished and removed, the buried drum and the potential for other subsurface materials remain a concern. No CRECs or HRECs were identified. During project construction, potential hazards could occur through the disturbance and transport of soils containing residual pesticides/herbicides or from encountering buried materials and removal of the partially buried drum, which would result in a **potentially significant impact**. Accordingly, the proposed project would be required to implement **Mitigation Measure HAZ-1**, which requires compliance with the Phase I ESA recommendations which include geophysical survey and ACM sampling, to evaluate potential soil, vapor, and groundwater contamination. Implementation of **Mitigation Measure HAZ-1** would ensure the safe handling and disposal of any potentially hazardous materials encountered during construction of the proposed project (e.g., the partially buried drum) and would reduce potentially significant impacts related to hazardous materials to **less than significant with mitigation incorporated.**

Additionally, because the proposed project would result in ground disturbance of more than one acre, construction activities would be subject to the SWRCB NPDES Construction General Permit. Compliance with this permit requires preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP), which includes hazardous materials storage and handling requirements. For example, construction operators must store hazardous materials in watertight containers with appropriate secondary containment or in fully enclosed sheds. The SWPPP must also incorporate best management practices (BMPs) to control and direct surface runoff, prevent spillage or leakage, and ensure that stormwater runoff does not introduce pollutants into receiving waters.

As discussed in Section 4.9.3, Existing Environmental Setting, CalGEM identified one dry-hole oil and gas well (API No. 0411320081) located within the northeastern portion of the project site, approximately 80 feet south of Marshall Road. Per CalGEM records, the well spud date (i.e., the date the well was first drilled) was November 3, 1969. The well was ultimately drilled to a depth of 5,000 feet and was never put into production. Records indicate that the well, owned by Mobil Oil Exploration & Production North America, Inc., was plugged and abandoned on November 10, 1969. Given that this dry well never produced gas or oil and was plugged and abandoned shortly after being drilled, the potential for significant soil or groundwater impact is considered low, but is still a **potentially significant impact.** Therefore, the proposed project would be required to implement **Mitigation Measure HAZ-2**, which requires identification, evaluation, and management of abandoned wells in accordance with CalGEM guidance, reducing potential impacts to **less than significant with mitigation incorporated**.

Accordingly, with implementation of **Regulatory Compliance Measure WQ-1**, which includes preparation of an SWPPP (refer to Section 4.10, Hydrology and Water Quality), and implementation of **Mitigation Measures HAZ-1** and **HAZ-2**, this potentially significant impact would be reduced to a less than significant level with mitigation incorporated. Conformance with existing government regulations (federal, State, regional, and local) regarding the transport, use, and disposal of hazardous materials associated with the proposed project would also ensure the proposed project would have a **less significant impact with mitigation incorporated** related to the potential release of hazardous materials commonly associated with construction activities into the environment.

Threshold 4.9.3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. As discussed under Section 4.9.3.5, Existing Environmental Setting, there are no existing or planned schools within a 0.25-mile radius of the project site. The closest school to the project site is the Bridgeway Island Elementary School at 3255 Half Moon Bay Circle, which is located approximately 0.40 mile north of the project site. As stated under Thresholds 4.9.1 and 4.9.2, the proposed project is not anticipated to release hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste in significant quantities. Construction activities associated with the proposed project would use a limited amount of hazardous and flammable substances/oils during heavy equipment operation for site excavation, grading, and construction. The amount of hazardous chemicals present during construction would be limited and would be in compliance with existing government regulations. Although project operations may also require more regular transport, use, and/or disposal of hazardous materials (e.g., solvents, cleaning agents, sanitizing solutions, paints, fertilizers, and pesticides) than existing conditions, residential uses typically do not present a hazard associated with the accidental release of hazardous substances into the environment because residents are not anticipated to use, store, dispose or transport large volumes of hazardous materials.

Accordingly, any hazardous materials associated with construction or operation of the proposed project would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local standards and regulations as described above. Therefore, **no impacts** related to hazardous emissions or handling of hazardous or

acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school would occur, and no mitigation is required.

Threshold 4.9.4: Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. According to the Phase I ESA prepared for the proposed project, the project site is not included on any hazardous materials sites pursuant to Government Code Section 65962.5 and as a result would not create a significant hazard to the public or the environment. Therefore, there would be **no impact**, and no mitigation is required.

Threshold 4.9.5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. As discussed under Section 4.9.3.6, Existing Environmental Setting, the nearest public airport to the project site is the Sacramento Executive Airport located approximately four miles southeast of the project site. The next nearest public airport is the Sacramento International Airport, which is located approximately 10 miles north of the project site. The project site is located outside of the Airport Influence Areas, Airport Compatibility Zones, and noise exposure contours for both airports.[10] Moreover, the project is not constructing or erecting any structures that would penetrate navigable airspace as defined by 14 CFR Part 77 and operate as obstructions to aircraft operating in the area. Therefore, the proposed project would not result in a safety hazard or excessive noise exposure to people residing or working in the project area, and there would be **no impact**. No mitigation is required.

Threshold 4.9.6: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. West Sacramento has adopted an Emergency Operations Plan (EOP),[11] and a Supplemental Evacuation Annex.[12] The EOP establishes the framework for emergency management and interagency coordination using the Standardized Emergency Management System (SEMS) and the Incident Command System (ICS), which allow local agencies to coordinate with Yolo County, regional, and State emergency management agencies during large-scale incidents. The Evacuation Annex functions as a support document to the EOP and provides strategies and protocols

10 City of Sacramento. 1998. *Sacramento Executive Airport. Comprehensive Land Use Plan (CLUP)*. Amended May 1999.

11 City of West Sacramento. 2016. *City of West Sacramento Emergency Operations Plan*. December. Website: https://www.cityofwestsacramento.org/home/showpublished document/4268/63640823391 4630000 (accessed February 2026).

12 City of West Sacramento. 2024. *Evacuation Annex: A Functional Annex to the City of West Sacramento Emergency Operations Plan.* August. Website: https://www.cityofwestsacramento.org/home/show publisheddocument/20439/638820609837200000 (accessed February 2026).

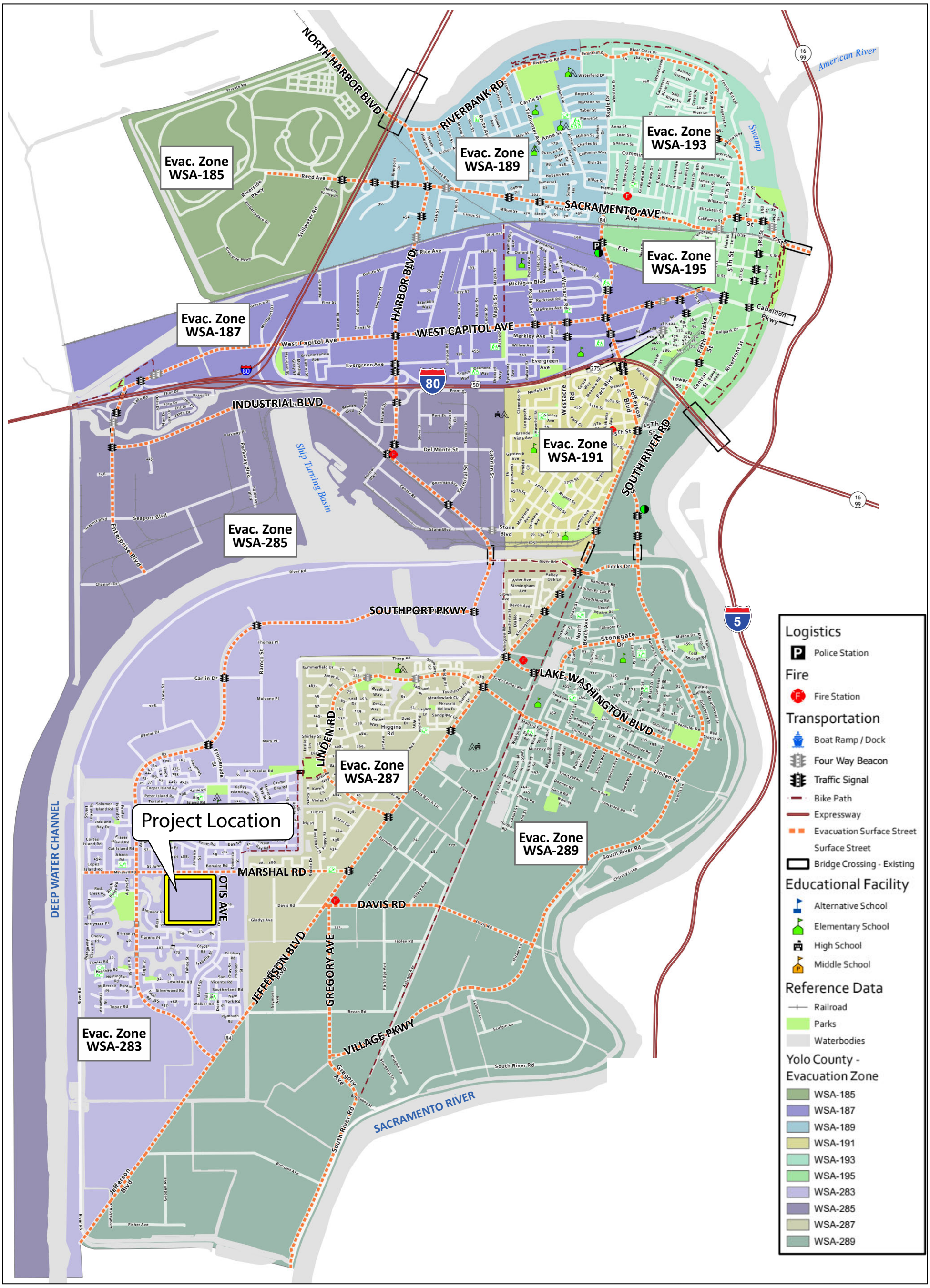
for evacuation events within the City. Additionally, the Evacuation Annex identifies procedures for issuing evacuation warnings and orders, coordinating traffic control and route management, and assisting vulnerable populations during emergency evacuations. According to a memorandum prepared by the West Sacramento Fire Department (WSFD),[13] the WSFD states that the City is well prepared to initiate either a full or partial evacuation of residents. In the event of a large-scale emergency, the City's Emergency Operations Center (EOC) would be activated to coordinate decision-making and logistics among City management, public safety, and emergency services. Because each emergency presents unique circumstances, the City does not rely on a fixed or generic route plan; rather, evacuation routes are developed in real time to best manage vehicle and pedestrian movement and maintain public safety. This allows the City to respond dynamically to emergency situations based on the particular circumstances of each occurrence.

The City has developed 11 pre-planned evacuation zones to assist with helping with the evacuation process; each of these 11 zones specifies primary suggested evacuation routes utilizing the surrounding roads and other geographic features. These zones also include pre-identified Rally Points that can assist the residents during an evacuation process. A detailed map of each evacuation zone can be found in **Figure 4.9-1: Evacuation Map.** As shown in **Figure 4.9-1**, the project site is located within Yolo County Evacuation Zone WSA-283, and Marshall Road is designated as an Evacuation Surface Street. Marshall Road would also provide direct access to nearby evacuation routes, including Southport Parkway and Jefferson Boulevard, ultimately connecting to one of the many evaluation points throughout the City.

Construction. Construction activities that may temporarily restrict vehicular traffic would be required to implement appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures. Typical City requirements include use of signage and an access plan to ensure continued emergency access during construction. As prescribed in Section 4.17, Transportation, **Regulatory Compliance Measure TRA-1** requires the construction contractors to implement a Transportation Management Plan (TMP) to manage temporary lane closures along Marshall Road so as not to substantially impair its capacity to accommodate community evacuation and simultaneous emergency access. The proposed project would be required to comply with these requirements, which would maintain emergency access and allow for evacuation if needed during construction activities. Compliance with these requirements would ensure that short-term (construction) impacts related to this issue would be less than significant. With adherence to **Regulatory Compliance Measure TRA-1,** construction of proposed project would not substantially impact existing evacuation plans in the City. Therefore, project construction would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be **less than significant**.

Operation. As discussed in Chapter 3.0, Project Description, the project site would be connected to the surrounding road network by way of four full-access roads: two off Marshall Road, Main Avenue opposite the intersection with Martinique Street and Street B, opposite the intersection with

[13] Steve Binns, Fire Chief. 2025. *City of West Sacramento Memorandum, City Evacuation Planning and Response.* March 5.



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Project Location

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MILES

SOURCE: City of Sacramento 2026

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FIGURE 4.9-1

Brar Farms Residential Development Project

Evacuation Map

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Jamaica Street; and two off Otis Avenue, Street D and Street F. The proposed project would include development of local streets to facilitate circulation throughout the proposed residential development, all of which would be public and meet applicable City Standards. In the northern portion of the project site, Main Avenue, which runs north-south, would serve as a primary street linking Marshall Road to Otis Avenue, by way of Street D, while providing direct access to Streets C and D. Street C would connect to Streets A and B, and Street D would connect to Streets B, E, F, and G. Main Avenue would also include the installation of a traffic circle at Main Avenue and Street D. In the southern portion of the project site, Street I would connect to Streets B and E and Street H would connect to Streets F and G.

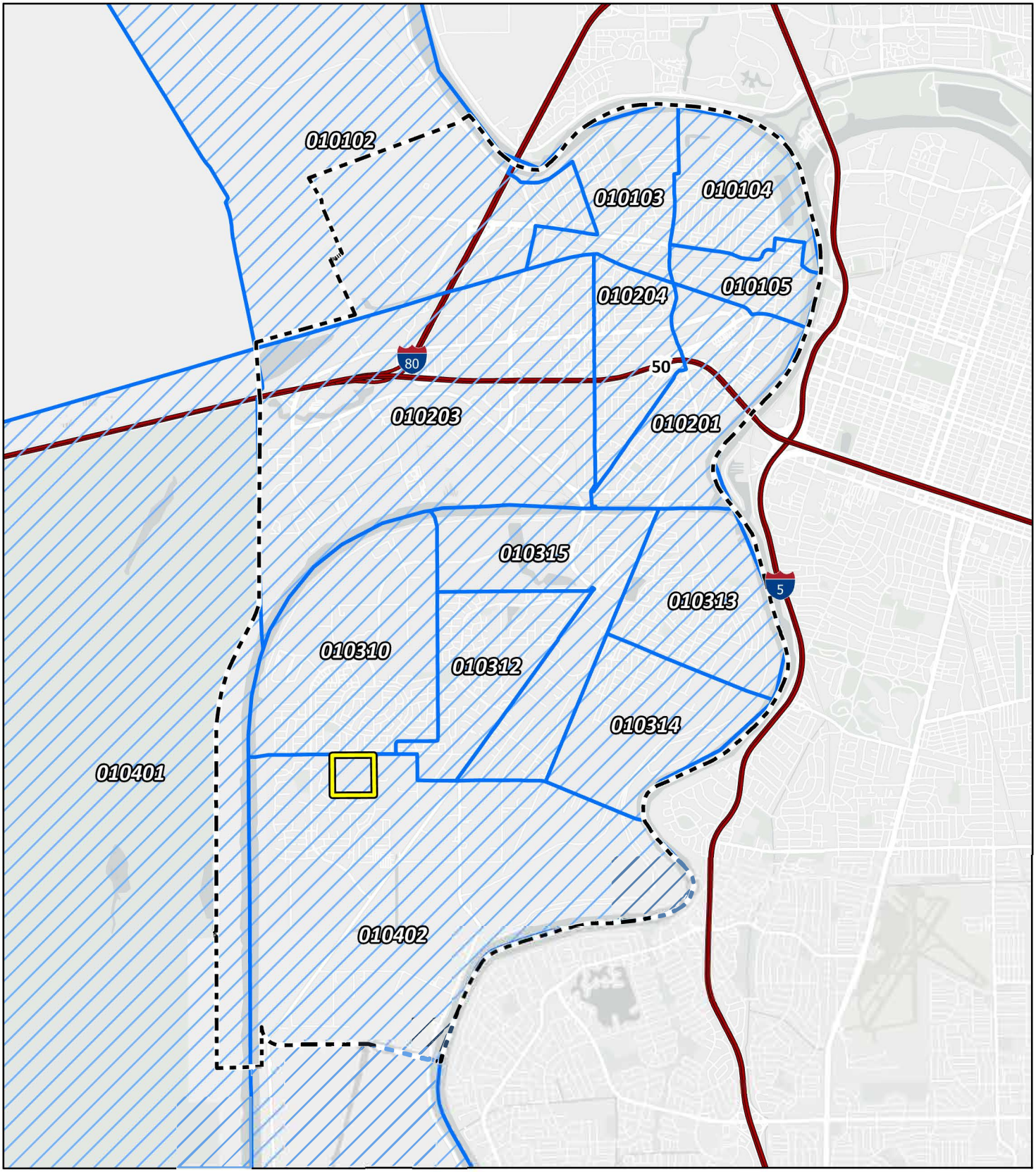
In accordance with the California Fire Code (CFC), the proposed project would include the design, construction, and maintenance of structures, roadways, and facilities to maintain appropriate emergency/evacuation access throughout the project site. Martinique Street, Jamaica Street, Street D, and Street F would serve as the first point of access for emergency vehicles, and emergency responders would be able to access the proposed development via the internal circulation system. All roads developed as part of the proposed project would be designed and constructed to provide adequate widths for public safety pursuant to local requirements and in accordance with the CFC to allow fire truck access as shown in **Figure 3-10: Proposed Fire Truck Access** in Chapter 3.0, Project Description.

The project also includes off-site frontage improvements along Marshall Road, consisting of new sidewalks, curbs, and gutters, undergrounding of overhead utilities, street lighting, and landscaping. Similar frontage improvements would be constructed along the Otis Avenue frontage. A single-lane roundabout at the intersection of Marshall Road and Otis Avenue adjacent to the northeastern corner of the project site would also be developed. The primary purpose of this facility is to control existing and project related traffic along Marshall Road and Otis Avenue. Accordingly, these proposed improvements would not physically interfere with the City's adopted EOP or evacuation routes, and the operational function of Marshall Road as an evacuation corridor would be maintained during long-term operations.

In addition, the City evaluated the time required to evacuate residents from each census tract in West Sacramento in the Preliminary City Evacuation Evaluation.[14] According to the evaluation, the proposed project is located within Census Tract 103.10 (Southport Northwest Bridgeway Lakes area). Please refer to **Figure 4.19-2, City of West Sacramento Census Tracts,** which shows the census tracts within the City. As of 2025, this census tract contains approximately 1,970 households, 6,382 residents, and approximately 4,343 vehicles that may require evacuation during an emergency event, as shown in **Table 4.9.A: City of West Sacramento Census Tracts Population and Vehicles for Evacuation and Evacuation Duration to Clear**. The evaluation estimates that evacuation of any individual census tract within the City would require less than one hour to clear residents under existing conditions. Specifically, it is estimated that the Southport Northwest Bridgeway Lakes area would be able to clear residents from the Southport Northwest Bridgeway Lakes area in approximately 46 minutes (see **Table 4.9.A**).

[14] City of West Sacramento. 2025. *Preliminary City Evacuation Evaluation*. June.

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FIGURE 4.9-2

Brar Farms Residential Development Project

City of West Sacramento Census Tracts

SOURCE: Esri (2026); United States Census Bureau, City of West Sacramento (2026)

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Table 4.9.A: City of West Sacramento Census Tracts Population and Vehicles for Evacuation and Evacuation Duration to Clear

Census Tract	Census Tract Area	Households	Population	Vehicles[1]	Duration to Clear (mins)	Gateway 1	Gateway 2	Gateway 3	Gateway 4
101.02	Northwest West Sacramento, Bryte	530	1,794	1,127	13	North Harbor Boulevard (Capacity 1,700)	I-80 west-bound at Reed Avenue	I-80 east-bound at Reed Avenue	----
101.03	Bryte	1,526	5,391	3,566	42	North Harbor Boulevard (Capacity 1,700)	I-80 west-bound at Reed Avenue	I-80 east-bound at Reed Avenue	----
101.04	Broderick	2,213	6,212	4,002	53	I Street Bridge (Capacity 700)	Tower Bridge (Capacity 1,100)	I-80 west-bound at Reed Avenue	I-80 east-bound at Reed Avenue
101.05	Washington District	633	1,423	954	21	Tower Bridge (Capacity 1,100)	Tower Bridge (Capacity 1,100)	US-50 west-bound at Jefferson Boulevard	----
102.01	State Streets Bridge District	1,638	3,505	3,029	42	US-50 at Harbor Boulevard (southbound Slip On-Ramp) (Capacity 2,200)	US-50 west-bound at Jefferson Boulevard	I-80 west-bound at West Capitol Avenue (west-bound Slip On-Ramp)	US-50 east-bound at South River Road
102.03	Glide	2,046	5,671	3,320	36	US-50 WB Harbor Boulevard (SB Slip On-Ramp) (Capacity 2,200)2	US-50 EB at Harbor Boulevard (Capacity 2,200)	US-50 EB at Jefferson Boulevard (Capacity 1,500)	US-50 EB at Jefferson Boulevard (Capacity 1,500)
102.04	Michigan, Old West Sacramento	2,334	5,737	3,506	42	US-50 WB at Harbor Boulevard (NB Loop On-Ramp) (Capacity 1,900)	US-50 WB at Harbor Boulevard (NB Loop On-Ramp) (Capacity 1,900)	US-50 EB at Jefferson Boulevard (Capacity 1,500)	US-50 EB at Jefferson Boulevard (Capacity 1,500)
103.10	Southport northwest Bridgeway Lakes	1,970	6,382	4,343	46	US-50 WB at Harbor Boulevard (NB Loop On-Ramp) (Capacity 1,900)	US-50 EB at Harbor Boulevard (Capacity 2,200)	US-50 EB at Jefferson Boulevard (Capacity 1,500)	Jefferson Boulevard (CA 84) to the south (Capacity 1,700)

Table 4.9.A: City of West Sacramento Census Tracts Population and Vehicles for Evacuation and Evacuation Duration to Clear

Census Tract	Census Tract Area	Households	Population	Vehicles[1]	Duration to Clear (mins)	Gateway 1	Gateway 2	Gateway 3	Gateway 4
103.12	Southport Linden Loop	1,900	5,568	3,989	42	US-50 WB at Harbor Boulevard (NB Loop On-Ramp)	US-50 EB at Harbor Boulevard (Capacity 2,200)	US-50 EB at Jefferson Boulevard (Capacity 1,500)	Jefferson Boulevard (CA 84) to the south (Capacity 1,700)
103.13	Southport northeast Linden	1,713	4,795	3,536	49	US-50 WB at Harbor Boulevard (NB Loop On-Ramp) (Capacity 1,900)	US-50 EB at South River Road (Capacity 1,300)	US-50 EB at Jefferson Boulevard (Capacity 1,500)	South River Road to the south (Capacity 1,700)
103.14	Southport southeast Linden	788	2,120	1,587	22	US-50 WB at Harbor Boulevard (NB Loop On-Ramp) (Capacity 1,900)	US-50 EB at South River Road (Capacity 1,300)	US-50 east-bound at Jefferson Boulevard (Capacity 1,500)	Jefferson Boulevard (CA 84) to the south (Capacity 1,700)
103.15	Southport Devon Avenue	417	1,356	914	13	US-50 WB at Harbor Boulevard (NB Loop On-Ramp) (Capacity 1,900)	US-50 EB at South River Road (Capacity 1,300)	US-50 east-bound at Jefferson Boulevard (Capacity 1,500)	S River Rd to the south (Capacity 1,700)
104.02	Southport southwest Bridgeway Lakes	1,368	4,651	3,078	43	Jefferson Boulevard (CA 84) to the south (Capacity 1,700)	South River Road to the south (Capacity 1,700)	I-80 WB West Capitol Avenue (EB Loop On-Ramp) (Capacity 1,800)	US-50 EB at South River Road (Capacity 1,300)
West Sacramento	Citywide	19,074	54,496	36,921	----	----	----	----	----

Source: City of West Sacramento, Community Development Department, Transportation and Mobility Division. 2025. Preliminary City Evacuation Evaluation. June.

[1] Persons Per Vehicle calculated using vehicle ownership data. No vehicle households assume on average 0.7 vehicles per household are available in the event of evacuation (e.g., from a neighbor). Three plus vehicle households assume not all vehicles will be used in the event of evacuation (assumes average 2.5 vehicles per household used).

[2] Gateway Capacity is shown in vehicles per hour.

EB= East Bound SB= Southbound
NB= Northbound WB= Westbound

A citywide evaluation was also conducted to determine the evacuation time needed to clear all residents during an evacuation of the entire city. According to the evaluation, it is estimated that it would take approximately 2.6 hours to evacuate all residents in the city under a full citywide evacuation scenario, including those within the Southport Northwest Bridgeway Lakes area by utilizing the nearest available roadway gateways for exiting City limits, which connect local streets in the Southport area to the regional roadway network. These gateways include the following:

- Gateway 1: U.S. Highway 50 (US-50) Westbound at Harbor Boulevard (northbound Loop On-Ramp) with a capacity of 1,900 vehicles/hour
- Gateway 2: US-50 eastbound at Harbor Boulevard with a capacity of 2,200 vehicles/hour
- Gateway 3 US-50 eastbound at Jefferson Boulevard with a capacity of 1,500 vehicles/hour
- Gateway 4: Jefferson Boulevard (SR-84) to the south with a capacity of 1,700 vehicles/hour

The evaluation concluded that these four gateways would have adequate access to accommodate the total number of vehicles that would utilize these gateways within the Southport Northwest Bridgeway Lakes area under the existing condition.

Upon full build out of the proposed 259 single-family homes, it is anticipated that the proposed project would result in a net increase of approximately 725 residents, increasing the population of the Southport Northwest Bridgeway Lakes area from 6,382 residents to approximately 7,107 residents. Although, the exact number of vehicles generated by the proposed project cannot be ascertained at this time, utilizing the average of 2.5 vehicles per household per the Preliminary City Evacuation Evaluation, it is assumed that the proposed project could generate approximately additional 648 vehicles,[15] increasing the total number of vehicles within of Census Tract 103.10 from 4,343 vehicles to approximately 4,991 vehicles.[16] Subsequently, the project would represent an estimated 15 percent increase in vehicles likely to be used during an evacuation in the Southport Northwest Bridgeway Lakes area. Given that evacuation traffic from the Southport Northwest Bridgeway Lakes area would continue to be distributed across the four identified evacuation gateways, including US-50 westbound at Harbor Boulevard with a capacity of 1,900 vehicles per hour, US-50 eastbound at Harbor Boulevard with a capacity of 2,200 vehicles per hour, US-50 eastbound at Jefferson Boulevard with a capacity of 1,500 vehicles per hour, and Jefferson Boulevard SR-84 to the south with a capacity of 1,700 vehicles per hour, the combined capacity of these evacuation gateways would be approximately 7,300 vehicles per hour. This combined capacity would remain sufficient to accommodate the additional 648 vehicles generated by the proposed project and would not significantly impact the capacity of evacuation gateways serving the Southport Northwest Bridgeway Lakes area or the City.

As previously stated, it is estimated that the Southport Northwest Bridgeway Lakes area would be able to clear residents in approximately 46 minutes under existing conditions. Upon full buildout of

15 259 residential units x 2.5 average 2.5 vehicles per households ≈ 648 vehicles

16 4,343 vehicles in Census Tract 103.10+648 vehicles generated by the proposed project = 4,991 total vehicles

the proposed project, approximately 648 vehicles would be added to the Southport Northwest Bridgeway Lakes area, increasing evacuation demand and resulting in an estimated increase in evacuation clearance time of approximately 7 minutes, for a total estimated clearance time of approximately 53 minutes within the area. Although the proposed project would incrementally increase evacuation clearance time within the Southport Northwest Bridgeway Lakes area, this change does not represent a substantial increase and would not materially affect the overall citywide evacuation timeframe of approximately 2.6 hours under a full citywide evacuation scenario. In addition, the Southport Northwest Bridgeway Lakes area and the City of West Sacramento would continue to be managed under the City's EOP and Evacuation Annex, which guide and regulate evacuation events within the City and provide for coordinated emergency response, traffic management, and evacuation routing based on incident-specific conditions.

With adherence to **Regulatory Compliance Measure TRA-1,** construction of the proposed project would not substantially impact existing evacuation plans in the City. During long-term operation, the incremental increase in evacuation demand associated with full buildout, including approximately 648 additional vehicles and the resulting increase in clearance time of approximately 7 minutes, would be accommodated within the existing evacuation gateway network and would not result in a substantial change in evacuation system performance or capacity. Therefore, project construction and operation would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be **less than significant** with adherence to existing regulations that would be implemented by the city during the development review and permitting process**.**

Threshold 4.9.7: Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The State Fire Marshal has identified the City of West Sacramento, including the project site, as having no Fire Hazard Severity Zone (FHSZ) in a Local Responsibility Area (LRA). The nearest FHSZ is located approximately seven miles southeast of the project site, bordering the City of Elk Grove, in unincorporated Sacramento County. This FHSZ is largely classified as Moderate with a portion classified as High.[17] The project site is bound by residential uses to the north, west, and south, and a mix of agricultural and residential uses to the east. The proposed project would subdivide an approximately 60-acre project site into 259 lots for future development of single-family homes, 15 lots for open space and park use, and associated landscaping, roadway, and utility improvements. Project construction and operation would not change the characteristics of the project site in a way that would make the project site more susceptible to wildland fires. Furthermore, the proposed project would adhere to applicable building and fire codes, which would reduce the wildfire risk at the project site. Therefore, the proposed project would have **no impact** associated with exposing people or structures to a significant risk of loss, injury, or death involving wildland fires and no mitigation is required.

[17] California Department of Forestry and Fire Protection (CAL FIRE). n.d. Fire Hazard Severity Zone (FHSZ) Mapper. Website: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones (accessed February 2026).

4.9.7 Cumulative Impacts

Less Than Significant with Mitigation Incorporated. As defined in Section 15355(b) of the *State CEQA Guidelines*, cumulative impacts refer to the incremental impacts of the project added to other closely related past, present, and reasonably foreseeable probable future projects. The cumulative study area for hazards and hazardous materials is described in Chapter 4.0; the cumulative project list is provided in Chapter 4.0, **Table 4.A**, and a map of the cumulative project locations is provided in Chapter 4.0, **Figure 4-1**. A cumulative effect related to hazards and hazardous materials would require that multiple projects release hazardous materials simultaneously and in close proximity; therefore, the geographic area of concern for cumulative hazardous materials impacts is limited to the project site and its general vicinity, defined for purposes of this analysis as the Southport area of the City within approximately a 2-mile radius of the project site. Of the 26 cumulative projects identified in **Table 4.A**, ten projects (Projects 4, 5, 7, 14, 18, 19, and 22, 23, 24 and 26) are located within the Southport area and are considered within the cumulative study area for hazards and hazardous materials.

As detailed in this section, the proposed project would have no impact related to: (1) a significant hazard to the public or the environment because it is on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; (2) a safety hazard or excessive noise associated with a nearby airport; or (3) a significant risk of loss, injury or death involving wildland fires. Therefore, the proposed project would not contribute to cumulatively considerable impacts associated with a hazardous materials site, safety hazard or excessive noise associated with a nearby airport, or significant risk of loss, injury or death involving a wildland fire, and no mitigation is required.

As described under Threshold 4.9.1, construction and operation of the proposed project would require short-term transport, use, and/or disposal of hazardous materials However, residential uses typically do not present a hazard associated with the accidental release of hazardous substances into the environment because residents are not anticipated to use, store, dispose or transport large volumes of hazardous materials. Hazardous substances associated with residential uses are typically limited in both amount and use such that they can be contained without impacting the environment. Although some cumulative projects, including projects 4, 5, 7, 14, 14, 18, 19, 22, 22, 23, 24, and 26 have the potential to create impacts associated with hazardous materials, the environmental concerns associated with hazardous materials are site specific and localized in nature. Similar to the proposed project, any cumulative project for which hazardous materials are present during construction and/or operation would be required to implement best practices and/or mitigation to ensure hazardous materials are managed and disposed of in accordance with regulatory protocols. Accordingly, any future cumulative project must adhere to the appropriate and applicable regulations established by the USEPA, USDOT, OSHA, Cal/OSHA, RCRA, the WSFD's Hazardous Materials Division and the Yolo County Environmental Health Division regarding the, transport, storage, use, or disposal of hazardous materials; therefore, no cumulatively significant hazardous materials impacts would occur.

As described under Threshold 4.9.2, two RECs were identified: (1) the site's historical agricultural use from 1937 through 2016, during which pesticides, herbicides, and fertilizers may have been applied or stored on site, creating the potential for residual chemicals in the soil; and (2) the presence of a

partially buried 55-gallon drum of unknown contents near the former Building 1, could have released contaminants to the soil, resulting in a **potentially significant impact.** As specified in **Mitigation Measure HAZ-1**, the proposed project would be required to comply with the Phase I ESA recommendations. Adherence to these recommendations would ensure the safe handling and disposal of any potentially hazardous materials encountered during construction of the proposed project. Additionally, because the proposed project would result in ground disturbance of more than one acre, construction activities would be subject to the Construction General Permit. With implementation of **Regulatory Compliance Measure WQ-1**, which includes preparation of an SWPPP (refer to Section 4.10, Hydrology and Water Quality), and implementation of **Mitigation Measure HAZ-1**, this impact would be reduced to a less than significant level. Conformance with existing government regulations (federal, State, regional, and local) regarding the transport, use, and disposal of hazardous materials associated with the proposed project would also ensure the proposed project would have a less significant impact related to the potential release of hazardous materials commonly associated with construction activities into the environment. the proposed project would not make a cumulatively considerable contribution to hazardous materials impacts. Other development projects in the area would be subject to the same federal, State, and local regulations governing the storage, transport, and disposal of hazardous materials, as well as site-specific environmental site assessments and remediation requirements, where applicable. Compliance with these regulatory frameworks, combined with implementation of **Mitigation Measures HAZ-1** and **HAZ-2,** and **Regulatory Compliance Measure WQ-1**, would ensure that the proposed project's contribution to cumulative hazardous materials impacts would be **less than significant with mitigation incorporated.**

In addition, cumulative impacts to emergency response/evacuation can occur when an increase in vehicle traffic occurs in an area with limited vehicular access; therefore, the geographic area of concern for cumulative emergency response/evacuation impacts is the roadway network surrounding the project site. Out of the 26 cumulative projects listed in **Table 4.A** in Chapter 4.0, ten (Projects 4, 5, 7, 14, 18, 19, and 22, 23, 24, and 26) are located within the Southport area and are considered within the cumulative study area for emergency response/evacuation. As discussed above, under Threshold 4.9.6, during construction of the proposed project, adequate access for emergency vehicles would be required to be maintained. As prescribed in Section 4.17, of this EIR, **Regulatory Compliance Measure TRA-1** requires the construction contractors to implement a TMP to manage temporary partial lane closures, if required. Similarly, construction of the cumulative projects would be required to accommodate emergency access along and/or through their respective sites. The City would require any such roadway improvements to conform to established emergency access requirements set by the West Sacramento Fire Department, applicable provisions of the CFC and CBC, and/or other necessary fire authority requirements. Compliance with these requirements would ensure that short-term construction impacts from the proposed project and the cumulative projects would not result in a cumulatively considerable impact on emergency evacuation or interfere with an adopted emergency response or evacuation plan.

Furthermore, implementation of the proposed project in conjunction with the ten cumulative projects as identified above under Threshold 4.9.6, would contribute to an increase in population and housing growth in the City and Southport area. Upon full buildout of the ten cumulative projects within the Southport area, it is estimated that this would result in an additional 7,719 residential

units within the City. According to the City's 2021–2029 Housing Element Update, the average household size in West Sacramento is 2.8 persons. The combined construction of the related residential units would generate a total of approximately 21,613 new future residents within West Sacramento and approximately 19,290 additional future vehicles.[18] Although the proposed project in combination with the aforementioned cumulative projects would not result in a significant impact on population and housing because the increase in population would be consistent with the forecasted growth in the Sacramento Area Council of Governments' (SACOG) Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS), the addition of these 21,613 new future residents within West Sacramento and approximately 19,290 additional future vehicles,[19] would increase the total number of vehicles in the Southport area. This increase in vehicles would increase cumulative traffic volumes and could create bottlenecks during an emergency evacuation due to increased congestion at Jefferson Boulevard, Industrial Boulevard, and South River Road. These roadways serve as designated evacuation surface streets according to the City's Evacuation Map, shown in **Figure 4.9-1**.

Under the cumulative buildout scenario, evacuation of the Southport area, including the project site, would continue to be managed under the City's EOP and Evacuation Annex, which establish procedures for coordination and decision-making during emergency events. In the event of a large-scale evacuation of the City or the Southport area, the City's EOC would be activated to coordinate logistics among City management, public safety personnel, and emergency services. Additionally, the City utilizes 11 evacuation zones to guide residents during emergency events and reduce congestion along evacuation routes. As shown in **Figure 4.9-1**, three evacuation zones are located within the Southport area: WSA-283, WSA-287, and WSA-289. During an evacuation of the Southport area, residents and vehicles within each evacuation zone would ultimately be directed to the designated evacuation routes serving each zone, Zone WSA-283 to Industrial Boulevard, Zone WSA-287 to Jefferson Boulevard, and Zone WSA-289 to South River Road. Furthermore, according to the City's Evacuation Annex, traffic conditions would be monitored along evacuation routes, and operational adjustments would be made as necessary to maximize throughput. Law enforcement agencies would also be deployed to control evacuation traffic and implement road closures as needed. Because evacuation of the Southport area, including the project site, would continue to be managed under the City's EOP and Evacuation Annex, the cumulative increase in vehicles under the cumulative buildout scenario would not result in a cumulatively significant impact on emergency evacuation. Emergency response planning, including evacuation planning and operational protocols identified in the City's EOP and Evacuation Annex, is a dynamic process subject to periodic review and update to reflect both incremental and planned growth within the City. Because not all planned development is implemented at the same time, with some projects implemented over a period of years, the plans do not reflect evacuation for a full buildout scenario, but are amended as needed to provide for new development and increases in population, consistent with adopted General Plan growth assumptions. Accordingly, the City's emergency response framework adapts to accommodate cumulative buildout within the City and the Southport area.

[18] 7,719 total housing units from the ten cumulative projects x 2.5 average vehicles per household = 19,290 new vehicles

[19] 7,719 total housing units from the ten cumulative projects x 2.5 average vehicles per household = 19,290 new vehicles

Additionally, as some of the ten cumulative projects within Southport may include installation or extension of roads or infrastructure, such improvements would be limited to serving the applicable projects and would be required to comply with established emergency access standards set by the WSFD, as well as applicable provisions of the CFC, CBC, and other relevant fire authority requirements. Furthermore, the City's EOP and Evacuation Annex provide established operational protocols for emergency evacuations, including EOC activation, use of pre-planned evacuation routes, coordination of emergency services, and management of access and functional needs populations. These protocols would be implemented during evacuations of the Southport area and any Citywide mass evacuation events. Therefore, no cumulatively significant impacts related to emergency access/evacuation would occur.

For these reasons, when considered in conjunction with past, present, and future projects, impacts pertaining to hazardous materials, would be **less than cumulatively considerable** with adherence to **Mitigation Measures HAZ-1** and **HAZ-2, and Regulatory Compliance Measures WQ-1** and **TRA-1.**

4.9.8 Level of Significance Prior to Mitigation

Prior to mitigation, the proposed project would have potentially significant impacts related to the presence of two RECs.

4.9.9 Regulatory Compliance Measures and Mitigation Measures

4.9.9.1 Regulatory Compliance Measures

The proposed project would be required to comply with the standards set forth in **Regulatory Compliance Measure WQ-1** as detailed in Section 4.10, Hydrology and Water Quality, and **Regulatory Compliance Measure TRA-1,** as detailed in Section 4.17, Transportation.

4.9.9.2 Mitigation Measures

The following mitigation measures are required for the proposed project:

Mitigation Measure HAZ-1 **Implementation of Phase I Environmental Site Assessment (ESA) Recommendations.** The Project Applicant's Construction Contractor shall implement the following applicable recommendations of the Phase I ESA prepared for the proposed project, as applicable, to the satisfaction of the City's Environmental Compliance Officer, or designee.

- A limited subsurface investigation including geophysical survey should be conducted in order to determine the presence or absence of soil, soil vapor, and/or groundwater contamination due to the historical use of the subject property.
- All identified wells and septic tanks should be properly abandoned in accordance with governmental regulations.

- All containers of hazardous substances/petroleum products, waste tires, and debris piles, should be properly removed and disposed of in accordance with governmental regulations

The City of West Sacramento's Environmental Compliance Officer, or designee, shall confirm that the recommendations have been implemented into the design and construction of the proposed project prior to the issuance of grading or building permits.

Mitigation Measure HAZ-2

Coordination with the California Department of Conservation's California Geologic Energy Management Division (CalGEM). Prior to any well work on any oil, gas, or geothermal well, the project applicant shall coordinate with CalGEM regarding the identification, testing, and management of any existing or previously abandoned oil, gas, or geothermal wells located within the project site. The Applicant shall implement the following measures consistent with CalGEM's requirements under the California Public Resources Code (PRC) and California Code of Regulation (CCR):

- In conformance with CalGEM requirements, the property owner and/or project applicant shall obtain all rights necessary to re-abandon any wells and shall be responsible for the costs of re-abandonment.

- If any wells require abandonment or re-abandonment, the project applicant shall submit a Notice of Intention (NOI) to CalGEM through WellSTAR and obtain written approval prior to beginning work.

- Well casings shall be cut off at a depth of at least 5 feet, but no more than 10 feet below finished grade, in compliance with CCR Section 1723.5. Any modifications to meet this standard shall be performed only with a CalGEM permit.

- The Project Applicant shall ensure that future property owners are informed of (a) the existence of all wells on the property and (b) potential issues associated with development near oil or gas wells.

- Any soil containing hydrocarbons discovered during development shall be handled and disposed of in accordance with local, state, and federal laws, and appropriate authorities shall be notified if significant amounts are found.

The City's Environmental Compliance Officer, or designee, shall verify that all of the above measures have been implemented prior to issuance of grading or building permits.

4.9.10 Level of Significance after Mitigation

With implementation of **Regulatory Compliance Measure WQ-1** as detailed in Section 4.10, Hydrology and Water Quality**, Regulatory Compliance Measure TRA-1,** as detailed in Section 4.17 Transportation, and **Mitigation Measures HAZ-1** and **HAZ-2,** all identified potentially significant impacts related to hazards and hazardous materials would be reduced below a level of significance.

4.10 HYDROLOGY AND WATER QUALITY

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for the proposed Brar Farms Residential Development Project (proposed project) to impact hydrology and water quality in the City of West Sacramento (City). The analysis is based in part on the following documents: Drainage Study, provided in **Appendix G-1**; Water Study, and Supplemental Water Model Update Memorandum, provided in **Appendix G-2**; Runoff Control Plan, provided in **Appendix G-3**; Geotechnical Engineering Report, provided in **Appendix E**; and the Supplemental Geotechnical Recommendations, provided in **Appendix E-2**. Information from the City's General Plan,[1] the City's General Plan EIR,[2] the City Municipal Code, the City's Stormwater Management Program (SWMP) Planning Document,[3] and the State Water Resource Control Board (SWRCB) are also incorporated into this section.

4.10.1 Scoping Process

Several comments received during the scoping period addressed hydrology and water quality. These comments raised concerns about localized flooding, inadequate stormwater infrastructure, and long-term water demand. These comments also requested that a detailed analysis of stormwater management systems, drainage patterns, Federal Emergency Management Agency (FEMA) floodplain data, and consistency with Urban Level of Flood Protection (ULOP) standards be included in the Draft EIR.

4.10.2 Methodology

The proposed project's impacts to hydrology and water quality are evaluated based on the proposed project's adherence to local, regional, State, and federal standards; the proposed land uses and project design; changes in pre- and post-project storm water flows; and proposed best management practices (BMPs) for control of surface runoff and reduction of pollutants in storm water runoff.

4.10.3 Existing Environmental Setting

The approximately 60-acre project site is located at the corner of Marshall Road and Otis Avenue, in the western portion of the City of West Sacramento in Yolo County. The project site is currently undeveloped and relatively flat with a gentle slope toward the southwest. Although the project site primarily consists of loose disced soil from previous tilling activities, small patches of vegetation are present mainly along the northern edge of the site that consist of volunteer weeds and annual grasses.

The project site was the previously occupied by the H&H Nishimura Farms and was historically used for agricultural purposes. Eight buildings associated with H&H Nishimura Farms previously stood on the project site but have since been demolished. However, the project site is seasonally farmed for

1 City of West Sacramento. 2016. *City of West Sacramento General Plan 2035 Policy Document*. November. Updated January 2024.
2 City of West Sacramento. 2016. *City of West Sacramento General Plan Update Draft Environmental Impact Report*. August.
3 City of West Sacramento. 2003. *City of West Sacramento Stormwater Management Program (SWMP) Planning Document*. March.

hay by a volunteer farmer and maintained by the property owner, who mows and tills the land as needed.[4]

Pacific Gas and Electric Company (PG&E) transmission lines run along the northern and eastern sides of the project site boundaries. Additionally, an existing drainage ditch runs along approximately 1,000 feet of the western edge of the project site next to the Bridgeway Lakes retention pond.

4.10.3.1 Surface Waters

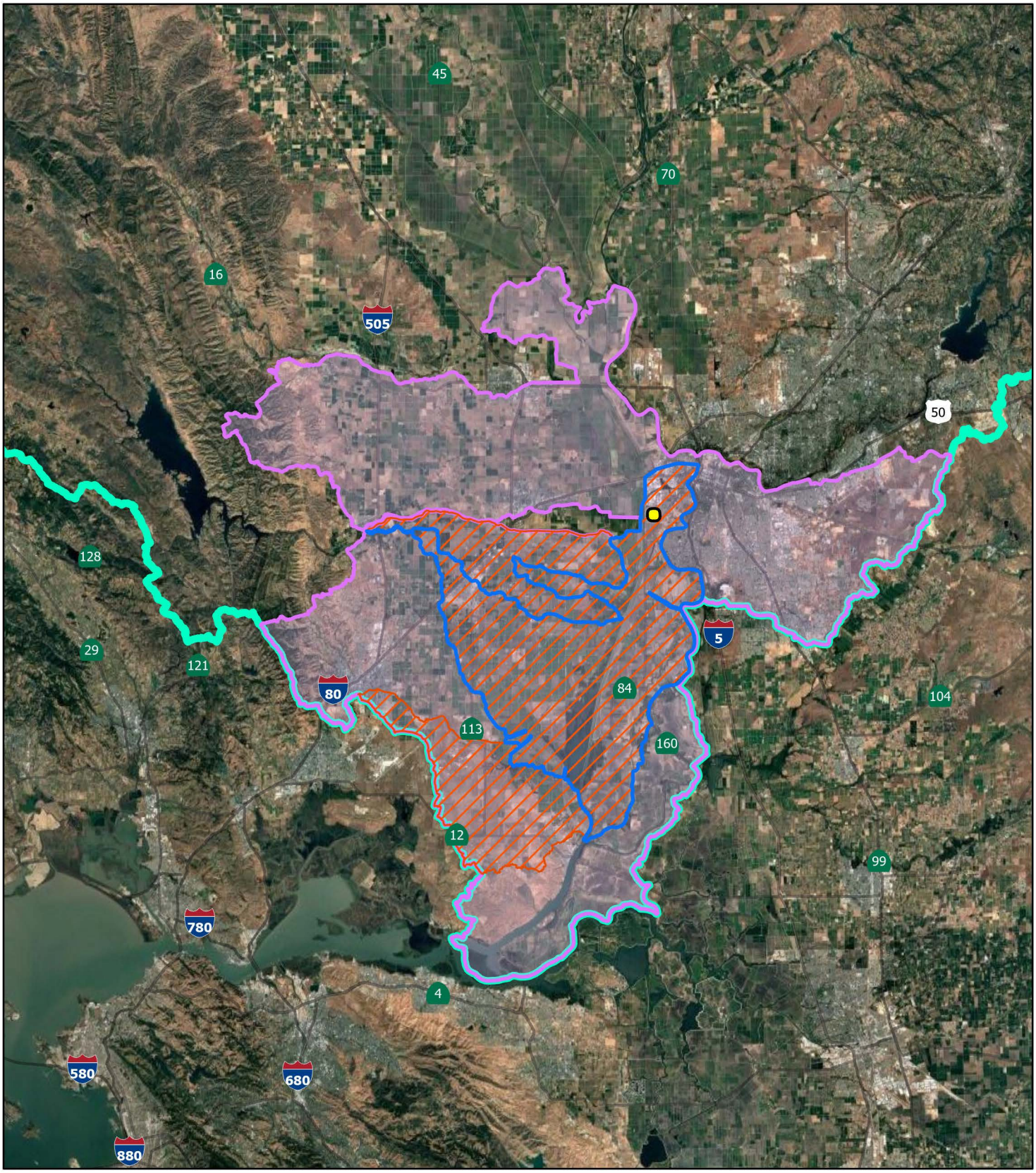
As shown on **Figure 4.10-1: Watershed and Subwatershed**, the project site is located within the Sacramento Valley Subregion of the Sacramento River Watershed, within the Toe Drain-Cache Slough Subwatershed or the Cache Slough Watershed.[5] The Sacramento River Watershed is drained by the Sacramento River. As shown on **Figure 4.10-2: Surface Waters**, the Sacramento River is located approximately two miles east of the project site and the Sacramento River Deep Water Ship Channel is located approximately 0.6 mile west of the project site. The Sacramento River flows south from the city and discharges into Suisun Bay via the Sacramento-San Joaquin Delta over 34 miles south of the project site. Suisun Bay drains via the Carquinez Strait to San Pablo Bay, the northern extension of the San Francisco Bay. The Sacramento River Deep Water Ship Channel is a canal from the Port of Sacramento to the Sacramento River. The Sacramento River Deep Water Ship Channel splits from the Sacramento River just north of the Sacramento-San Joaquin Delta, approximately 25 miles south of the project site.

The Sacramento River Watershed encompasses 26,000 square miles and drains much of the northern and central portions of California. The Sacramento Valley Subregion represents the portion of the Sacramento River Watershed starting at Shasta Lake and Redding in the north and extending south to Sacramento and the Sacramento-San Joaquin Delta. This region is characterized by the agricultural working landscape that lies between the foothills of the Sierra Nevada on the east and the Coast Ranges on the west. The Sacramento Valley Subregion's main hydrologic feature is the Sacramento River, which meanders through the center of the valley for approximately 250 miles, providing surface water supplies to agricultural and municipal users throughout California and habitat for many of the state's important fish and wildlife species. Controlled by the federal Central Valley Project and the State Water Project, annual outflow in the Sacramento River averages 22 million acre-feet, nearly one-third of California's total natural surface water runoff.[6]

[4] Project Applicant. 2025. BI-weekly Meeting. Personal communication with LSA. March 26.

[5] Sacramento River Watershed Program. Explore the Watershed. Website: https://sacriver.org/ (accessed April 28, 2025).

[6] Sacramento River Watershed Program. Explore the Watershed, Sacramento Valley Subregion. Website: https://sacriver.org/explore-watersheds/sacramento-valley-subregion/ (accessed April 10, 2026).



LSA

Project Location

Toe Drain-Cache Slough Subwatershed

Cache Slough Watershed

Lower Sacramento Subbasin

Sacramento Valley Subregion

0 26875 53750

FEET

FIGURE 4.10-1

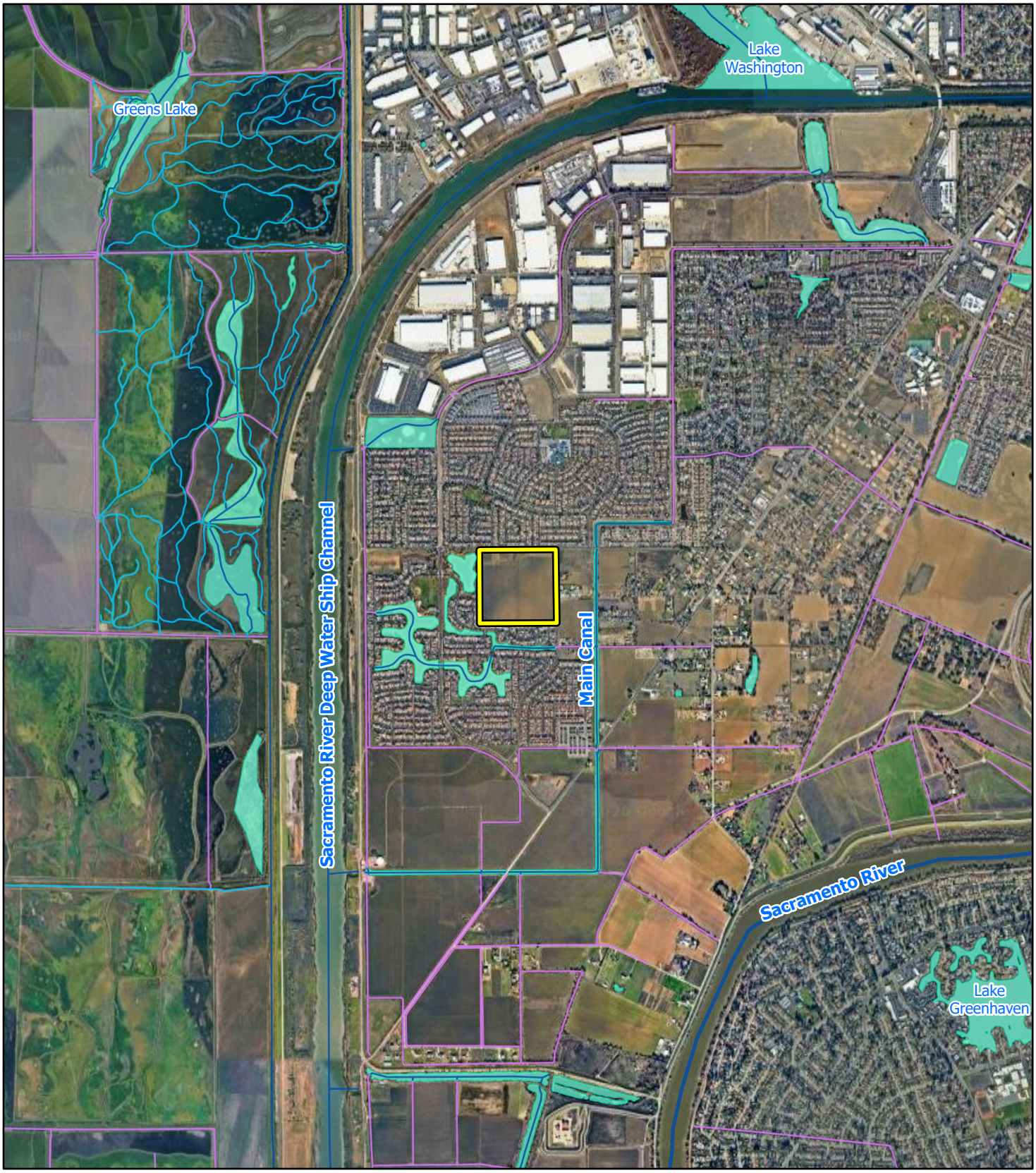
Brar Farms Residential Development Project

Watershed and Subwatershed

SOURCE: Google Maps (2024)

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LSA

Project Location

Lakes, Ponds, Reservoirs, Estuaries, and other Waterbodies

Stream type classification

Artificial Path

Canal/Ditch

Stream/River

FIGURE 4.10-2

N

0 1437.5 2875

FEET

SOURCE: Google Maps (2024)

Brar Farms Residential Development Project

Surface Waters

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West Sacramento and the project site are within the jurisdiction of the Central Valley Regional Water Quality Control Board (RWQCB). For regulatory purposes, the Central Valley RWQCB designates watershed areas in Hydrologic Units (HUs), which are further divided into Hydrologic Areas (HAs) and Hydrologic Subareas (HSAs). As designated by the Central Valley RWQCB, the project site is located within the Sacramento Delta HU.[7] The Central Valley RWQCB does not further divide the Sacramento Delta HU into HAs or HSAs.

4.10.3.2 On-Site Drainage

The project site does not currently contain any detention ponds or stormwater drainage collection system. Under existing conditions, stormwater runoff on the project site either infiltrates at the project site, or sheet flows in both an easterly and westerly direction from a localized high point on the project site. Stormwater runoff flowing east would discharge to the existing storm drain facilities along Otis Avenue and stormwater runoff flowing west would be collected by existing stormwater infrastructure associated with the existing residential development located west and southwest of the project site.

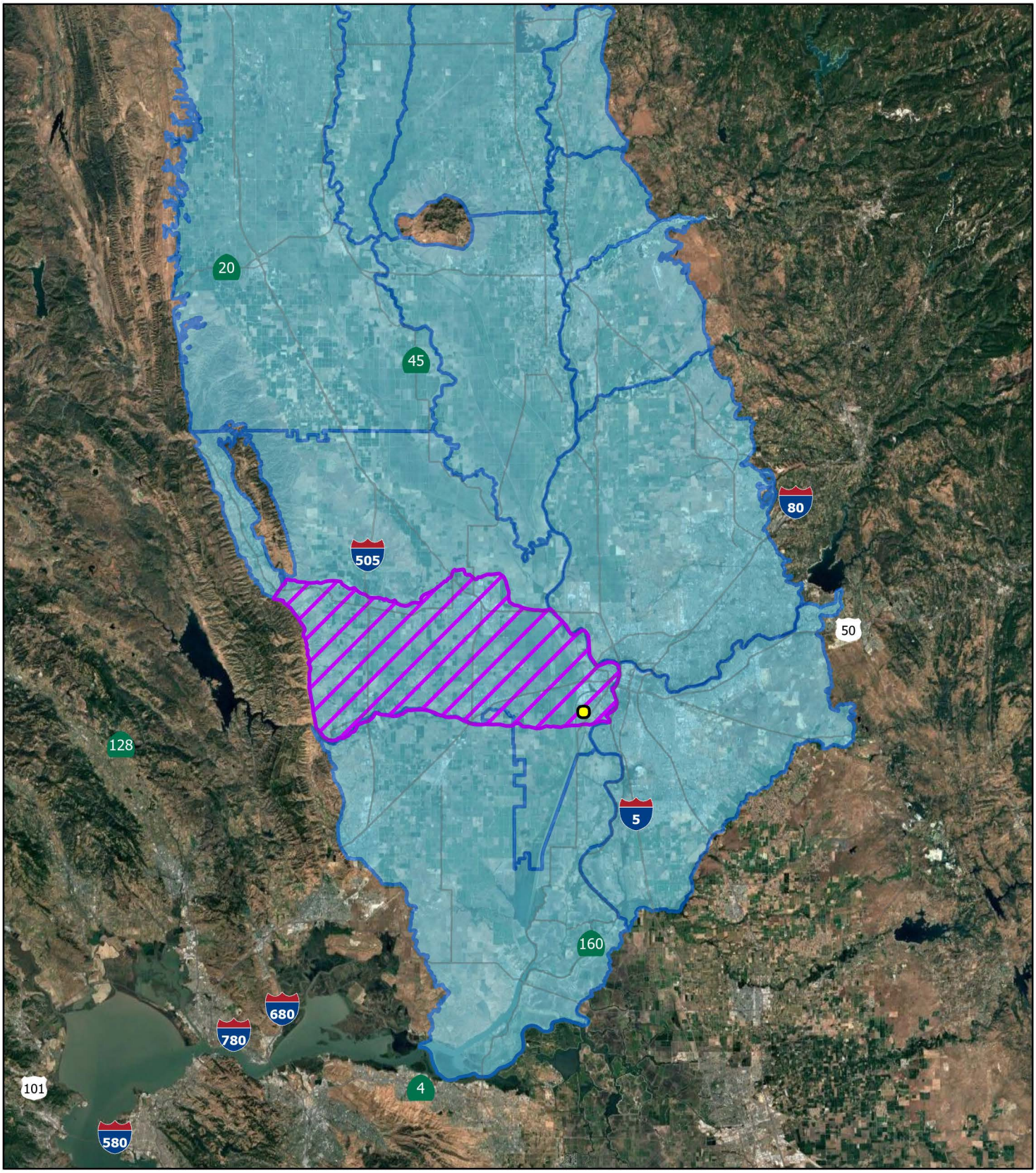
4.10.3.3 Surface Water Quality

Implementation of the proposed project would result in stormwater on the project site being directed into existing City-operated storm drain infrastructure located in Otis Avenue, located east of the project site. The City's storm drain system includes storm drains, culverts, and detention basins that collect and treat storm water from developed areas before discharging into either the Sacramento Deep Water Ship Channel or the Sacramento River, before discharging to Suisun Bay via the Sacramento-San Joaquin Delta. Stormwater runoff from the project site is discharged to the Sacramento Deep Water Ship Channel. Receiving waters for the proposed project include the Sacramento Deep Water Ship Channel, Sacramento-San Joaquin Delta, and Suisun Bay (see **Figure 4.10-2: Surface Waters**). The Sacramento-San Joaquin Delta and Suisun Bay are included on the most recent United States Environmental Protection Agency (USEPA) approved Clean Water Act (CWA) Section 303(d) list (2024) as impaired for pesticides (chlordane, dichlorodiphenyltrichloroethane [DDT], and dieldrin), metals (mercury and selenium), and toxic organics (polychlorinated biphenyls [PCBs], dioxin like PCBs, dioxin compounds, and furan compounds), and invasive species.[8] The Sacramento Deep Water Ship Channel is not included on the Section 303(d) list as impaired for any constituents.

[7] Central Valley Regional Water Quality Control Board (RWQCB). 1973. *Sacramento Hydrologic Basin Planning Area Map.* April. Revised August 1986.

[8] State Water Resources Control Board (SWRCB). *California 2024 Integrated Report (303(d) List/305(b) Report)*. Website: https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2024-integrated-report.html) (accessed February 2026).

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LSA

Project Location

Groundwater Basin: Sacramento Valley

Groundwater Subbasin: Yolo

FIGURE 4.10-3

N

0 34375 68750

FEET

Brar Farms Residential Development Project

Groundwater Basin and Subbasin

SOURCE: USGS 7.5' Quad - *[Enter quad name] ([Enter quad year])*, CA

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4.10.3.4 Groundwater

According to the California Department of Water Resources (DWR), the project site is located within the Sacramento Valley Groundwater Basin, Yolo Groundwater Subbasin. As shown on **Figure 4.10-3: Groundwater Basin and Subbasin**, the Yolo Groundwater Subbasin is located in the southern portion of the Sacramento Valley Groundwater Basin, primarily within Yolo County. It is bounded on the east by the Sacramento River, on the west by the Coast Range, on the north by Cache Creek, and on the south by Putah Creek. The Yolo Groundwater Subbasin covers approximately 256,000 acres (400 square miles) within Yolo and Solano Counties. Many studies have been conducted to determine the groundwater storage within parts or all of Yolo County. Groundwater storage capacity for the entire county for groundwater aquifer depths between 20 and 420 feet was calculated as 14,038,000 acre-feet.

Recharge to the Yolo Groundwater Subbasin occurs primarily through seepage from surface waters, including the Sacramento River. Groundwater levels are impacted by increased groundwater pumping and less surface water recharge occurring during periods of drought. This was specifically witnessed during periods of extended drought in the late 1970s and early 1990s. However, groundwater levels recover quickly in "wet" years. Long term trends do not indicate any significant decline in water levels, with the exception of localized pumping depressions in the vicinity of the Davis, Woodland, and Dunnigan/Zamora areas.[9]

According to the City's 2025 Urban Water Management Plan (UWMP),[10] water supply for West Sacramento is primarily provided by surface waters, wholly derived from the Sacramento River. The City also has access to groundwater supplies, extracted from the Yolo Groundwater Subbasin. At the time of incorporation, the City was using groundwater as the primary source of water to service the regional customers; however, with the development of the City's surface water supplies, the City reduced its reliance on its groundwater system and looked to preserve that supply to supplement supply deficits in its surface water system. In the context of the Yolo Groundwater Subbasin Groundwater Authority's work pursuant to the Sustainable Groundwater Management Act (SGMA), the City continues to preserve its groundwater assets and plans to use those assets, as needed, to meet its urban demands. As provided in the 2025 UWMP, the City has sufficient and reliable water supplies to meet forecasted customer water needs through 2050 considering water use forecasts for both normal and dry conditions. Forecasted water needs would be met primarily through surface water supplies, with the use of groundwater supplies only being needed during an emergency.

According to the Geotechnical Engineering Report prepared for the proposed project (see Appendix E), groundwater was not encountered during explorations performed in September 2024 to depths of five to seven feet below the ground surface (bgs). In addition, the Geotechnical Engineering Report reviewed available groundwater data from the DWR. Groundwater well data for State Well No. 08N04E18L001M, located approximately 0.15 mile west of the project site, indicated that groundwater elevation ranges from approximately one to 11 feet bgs at the well location.

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9 California Department of Water Resources (DWR). 2004. *Sacramento Valley Groundwater Basin Yolo Subbasin – Bulletin 118*. February 27.

10 City of West Sacramento. 2026. *2025 Urban Water Management Plan.* May 20.

4.10.3.5 Groundwater Quality

Groundwater found within the Yolo Groundwater Subbasin is characterized as a sodium magnesium, calcium magnesium, or magnesium bicarbonate type. The quality is considered good for both agricultural and municipal uses.[11]

4.10.3.6 Floodplains

The City of West Sacramento is within the natural floodplain of the Sacramento River at the confluence with the American River and is surrounded on all sides by a series of levees designed to provide flood protection. The levees channelize the Sacramento River into a fixed alignment by preventing future channel meandering and separating the channel from its historic floodplain.[12] In the vicinity of the project site, along the Sacramento River Deep Water Ship Channel, the Deep Water Ship Channel East Levee is located approximately 0.5 mile west of the project site and the Port South Levee is located approximately 1.7 miles north of the project site. In addition, the South Cross Levee is located approximately 1.8 miles south of the project site and the Sacramento River South Levee is located approximately 2.0 miles east of the project site, along the Sacramento River.[13] **Figure 4.10-4: West Sacramento Levees** provides the project site's proximity to levees.

According to FEMA Flood Insurance Rate Map (FIRM) No. 0607280010B (effective January 19, 1995), the project site is designated as Zone X, meaning that it is within an area protected from the 1-percent-annual-chance (100-year) flood by a levee, dike, or other structures subject to possible failure or overtopping during a larger flood.[14] However, according to floodplain mapping in the Sacramento-San Joaquin Valley compiled by the Department of Water Resources (DWR) pursuant to Senate Bill (SB) 5, portions of the project site are within the 200-year flood plain.[15] In addition, the City's General Plan EIR and modeled flood inundation areas for the 200-year flooding event indicate that portions of the project site would be inundated during a 200-year flooding event (see **Figure 4.10-5: 200-Year Flood Event Inundation**).[16] However, it should be noted that no available flood maps depict the project site, or portions of the project site, as being within a 100-year flood hazard zone.

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11 California Department of Water Resources (DWR). 2004. S*acramento Valley Groundwater Basin Yolo Subbasin – Bulletin 118*. February 27.

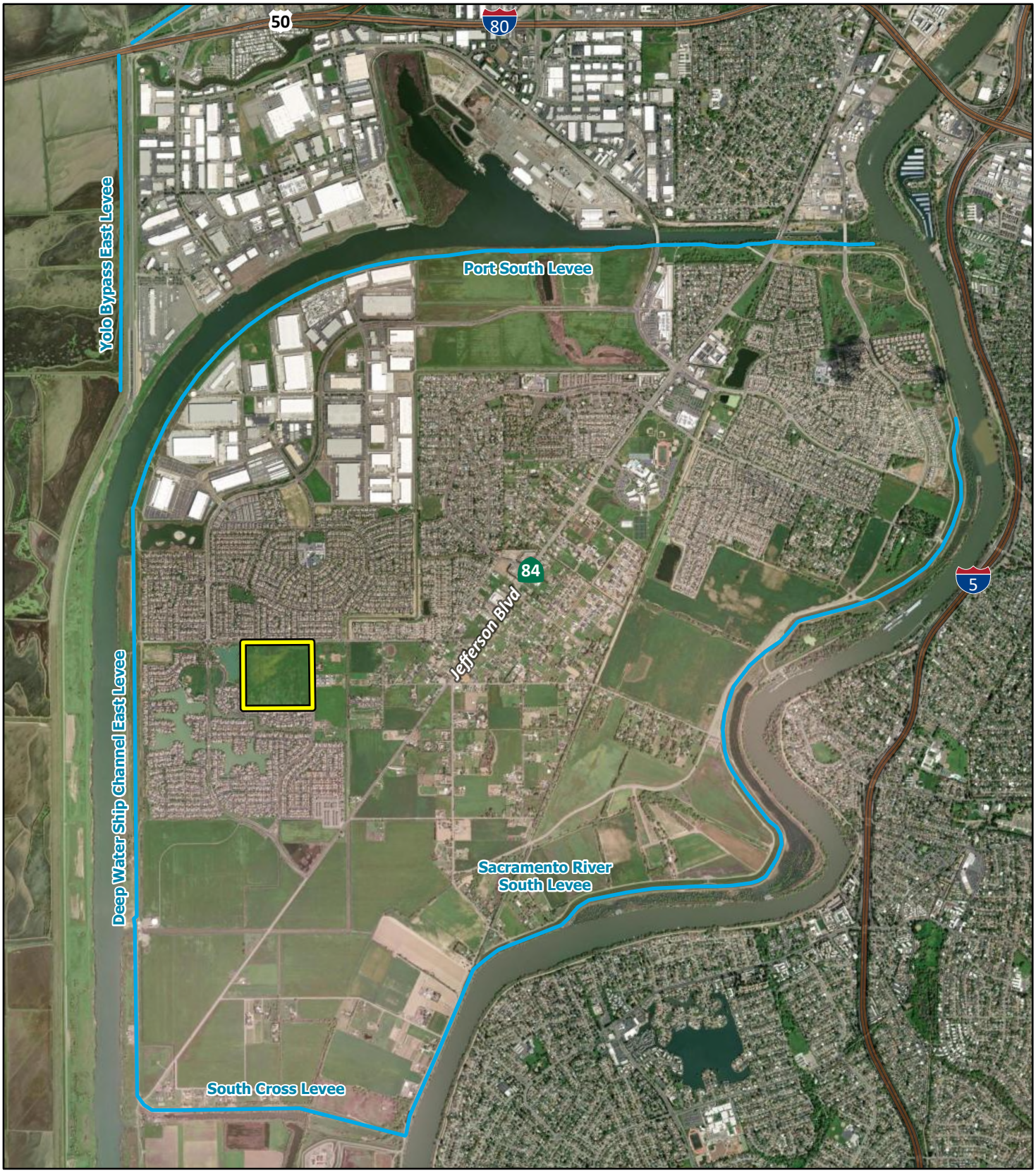
12 City of West Sacramento. 2016. *City of West Sacramento General Plan Update Draft Environmental Impact Report*. August.

13 City of West Sacramento. 2016. C*ity of West Sacramento General Plan Update Draft Environmental Impact Report,* Figure 3.9-3, City of West Sacramento Levee System and WSAFCA Flood Risk Reduction Projects. August.

14 Federal Emergency Management Agency (FEMA). 1995. Flood Insurance Rate Map (FIRM) No. 0607280010B. January 19.

15 California Department of Water Resources (DWR). Best Available Map, Floodplain Information. Website: https://gis.bam.water.ca.gov/bam/ (accessed Map 2026).

16 City of West Sacramento. 2016. *City of West Sacramento General Plan Update Draft Environmental Impact Report*, Figure 3.9-6, Modeled Flood Inundation Area for the 200-year Event.



LSA

Project Location

Levee

FIGURE 4.10-4

N

0 1600 3200

FEET

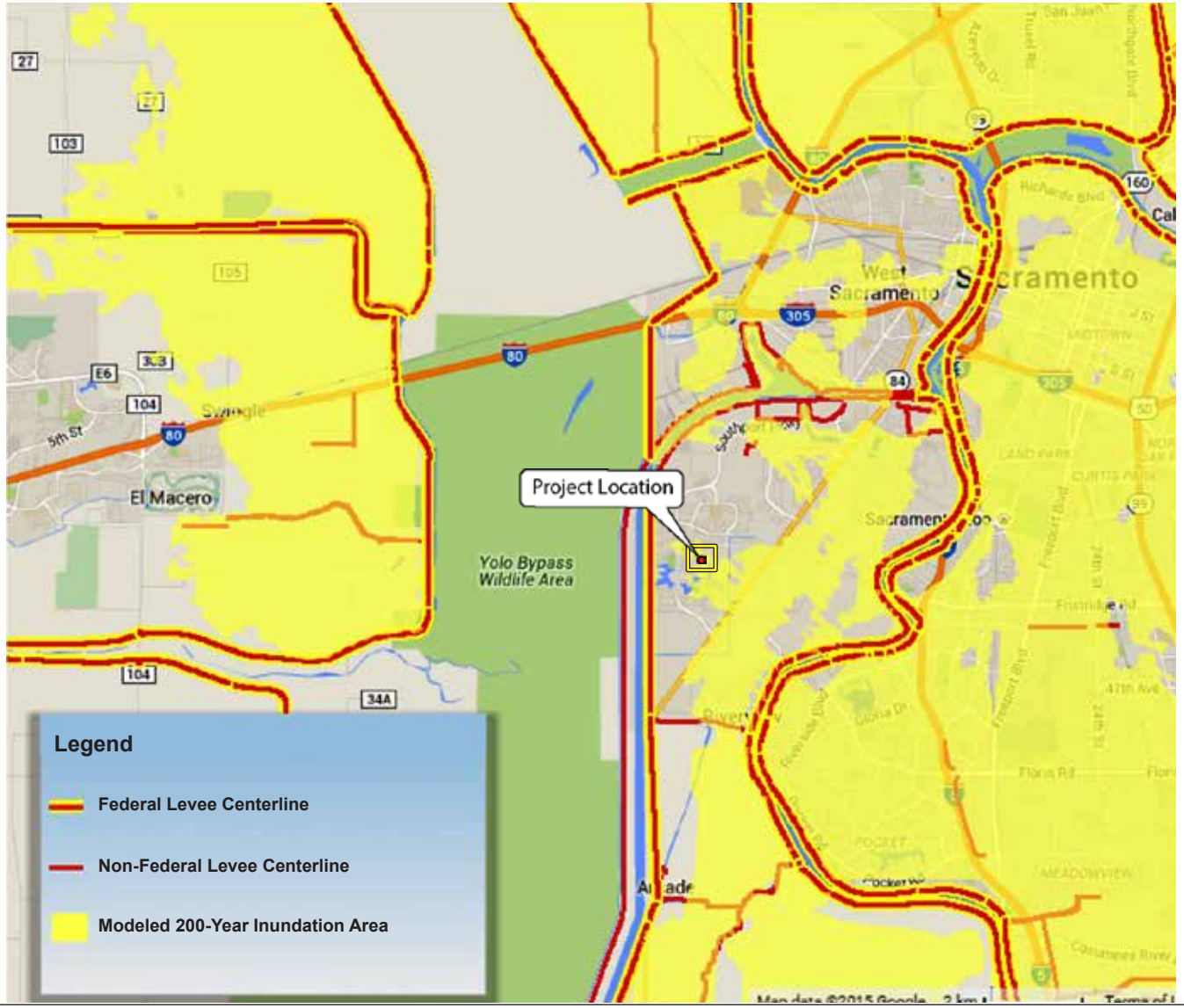
Brar Farms Residential Development Project

West Sacramento Levees

SOURCE: Google Maps (2026).

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LSA

FIGURE 4.10-5

NOT TO SCALE

SOURCE: California Department of Water Resources, 2015

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Brar Farms Residential Development Project

200-Year Flood Event Inundation

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The City's General Plan establishes a 200-year level of flood protection as the standard for the city. The Safety Element of the City's General Plan requires new development to achieve a minimum of 200-year level flood protection through either "i) the construction of flood management improvements or other mitigation measures beyond those required by the City's Floodplain Management Ordinance (Title 18 of the Municipal Code); or ii) payment of in-lieu flood management fees," as provided in Chapter 15.50 of the City's Municipal Code (Policy S-2.9). The Safety Element also requires the city to evaluate potential flood hazards prior to the approval of development projects (Policy S-2.11). Work to correct the identified deficiencies in the City's levee system is ongoing, and the magnitude of the flood depth and damage would depend on the location of the levee breach.

The WSAFCA, a joint powers authority formed in 1994 by the City of West Sacramento and Reclamation District (RD) 900, is working with DWR, the USACE, and the Central Valley Flood Protection Board to achieve the State's urban level of flood protection (ULOP) goal of providing 200-year flood protection for urban areas, as well as the City's goal of achieving 200-year level flood protection throughout the City by engaging in several levee improvement projects throughout the City, including the West Sacramento Levee Improvement Program (WSLIP) and EIPs, which are targeted to reduce flooding risk due to levee failure. As further described in this section, the City has collaborated with multiple agencies over many years to analyze the levees protecting the City, culminating in a Problem Identification Report. Subsequently, the USACE initiated and completed the General Reevaluation Review and the West Sacramento Project.

The levees protecting the City have generally performed well, with no major levee failures since they were constructed in the early 1900s. However, most City levees were not engineered to any modern engineering standards and relied on compaction and gravity to withstand the hydraulic forces of the Sacramento River. The materials were not homogeneous, and there are many areas where the levee is composed of sandy material. These poor soils resulted in levee deficiencies such as through-seepage, under-seepage and erosion along the riverbank.[17] In addition, according to the City's General Plan EIR, comprehensive evaluation of the levees revealed several deficiencies that would require substantial improvements to meet current flood protection standards.

Specifically, the Deep Water Ship Channel East Levee experiences through-seepage, under-seepage, slope instability, erosion, and non-compliant vegetation; the Port South Levee has inadequate levee height and experiences under-seepage, slope instability, and non-compliant vegetation; and the South Cross Levee has inadequate levee height and experiences under-seepage, slope instability, and non-complaint vegetation. These conditions could cause portions of the levee system to fail during a flooding event, which would trigger widespread flooding in the city, including at the project site. According to the City's General Plan EIR, modeled flood inundation depths of a hypothetical levee

[17] City of West Sacramento. 2016. *City of West Sacramento General Plan Update Draft Environmental Impact Report*, Figure 3.9-6, Modeled Flood Inundation Area for the 200-year Event.

failure of the Sacramento River South Levee indicates that the project site would be inundated with between 9 and 15 feet of water.[18]

In 2005, after Hurricane Katrina, the United States Army Corps of Engineers (USACE) re-wrote the standards for federal levees. When the City's levees were evaluated against these new standards, it was determined that the levees provide less than 100-year flood protection. The City subsequently engaged in an investigative campaign to evaluate the City's levee system and in 2006, property owners voted to raise funds for the local share of costs to repair the levees and requested a formal re-evaluation by the USACE of the levees protecting the City. The USACE initiated a General Re-evaluation Report in 2009 and completed it in 2015. The report led to the West Sacramento Project, which was authorized by the U.S. Congress in 2016 as part of the Water Infrastructure

Improvements for the Nations Act. Although the West Sacramento Project was authorized in 2016, funding was not provided until 2019, and it was not until 2022 that the West Sacramento Project received a "new start," meaning that the federal government was going to fund the West Sacramento Project to completion.

Also in 2006, Proposition 1E, the Disaster Preparedness and Flood Protection Bond Act, was passed by California voters and included funding for flood control structure repair. Through the Early Implementation Project (EIP) Program and Urban Flood Risk Reduction (UFRR) program, California allocated $1.2 billion of Proposition 1E funds to provide "worst first" improvements to address urban flood risk improvements as identified in the Central Valley Flood Protection Plan.

Using Proposition 1E and local funds, WSAFCA partnered with the State to make improvements to the levees protecting the City. Since 2006, WSAFCA, the State, and the USACE have expended approximately $317.2 million for the planning, design, land acquisition, and construction toward completion of the West Sacramento Project using a "worst first" criteria to prioritize projects to provide the greatest risk reduction first.[19,20] Senate Bill (SB) 5, Urban Level of Flood Protection, was adopted, which requires cities to make findings of adequate progress on the construction of a flood protection system that will achieve the "urban level of flood protection." "Urban level of flood protection" refers to the level of protection that is necessary to withstand flooding that has a 1-in-200 chance of occurring in any given year using criteria consistent with, or developed by, the DWR. The levee improvements discussed above accomplishes the intent of SB 5 by making adequate progress. In addition, SB 901 extended the deadline for the City to achieve 200-year flood protection to 2030. This extension was requested and necessary due to the delay in receiving federal funding after the West Sacramento Project was authorized in 2016 as well as because the time to design and construct levee improvements takes seven years to complete. This bill re-affirms the State's

[18] City of West Sacramento. 2016. *City of West Sacramento General Plan Update Draft Environmental Impact Report*, Figure 3.9-5, Modeled Flood Inundation Depths for a Hypothetical Levee Failure in the Southport Area of the City of West Sacramento. August.

[19] City of West Sacramento. n.d. Flood Protection. Website: https://www.cityofwestsacramento.org/government/departments/capital-projects-department/flood-protection (accessed March 13, 2026).

[20] City of West Sacramento. 2025. *City of West Sacramento Memorandum, Responses to Liberty Development Appeal.* February.

commitment to its share of funding the WSLIP and authorizes the State to dissolve Maintenance Area 4 and allow for RD 900 to take over levee maintenance for the area currently being maintained by the State, from the Sacramento Weir to the Tower Bridge. SB 586 then extended the deadline to achieve 200 year flood protection for the city until 2040 and extends the State's funding commitment to the West Sacramento Project. This bill also requires that by 2028 and every 5 years thereafter that the city reports to the legislature on the plans and actions taken to improve flood protection for the community.

4.10.4 Regulatory Setting

Federal, State, and local regulations and programs related to hydrology and water quality that are applicable to the proposed project are described below.

4.10.4.1 Federal Regulations

Clean Water Act. In 1972, the Federal Water Pollution Control Act (now referred to as the Clean Water Act [CWA]) was amended to require that the discharge of pollutants into waters of the United States from any point source be effectively prohibited unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. In 1987, the CWA was again amended to require that the United States Environmental Protection Agency (USEPA) establish regulations for the permitting of storm water discharges (as a point source) by municipal and industrial facilities and construction activities under the NPDES permit program. The regulations require that Municipal Separate Storm Sewer System (MS4) discharges to surface waters be regulated by an NPDES permit.

The CWA requires states to adopt water quality standards for water bodies and have those standards approved by the USEPA. Water quality standards consist of designated beneficial uses for a particular water body (e.g., wildlife habitat, agricultural supply, fishing), along with water quality criteria necessary to support those uses. Water quality criteria are set concentrations or levels of constituents (e.g., lead, suspended sediment, and fecal coliform bacteria) or narrative statements that represent the quality of water that support a particular use. Because California had not established a complete list of acceptable water quality criteria for toxic pollutants, USEPA Region IX established numeric water quality criteria for toxic constituents in the form of the California Toxics Rule (CTR).

When designated beneficial uses of a particular water body are being compromised by water quality, Section 303(d) of the CWA requires identifying and listing that water body as impaired. Once a water body has been deemed impaired, a Total Maximum Daily Load (TMDL) must be developed for each impairing water quality constituent. A TMDL is an estimate of the total load of pollutants from point, nonpoint, and natural sources that a water body may receive without exceeding applicable water quality standards (often with a "factor of safety" included, which limits the total load of pollutants to a level well below that which could cause the standard to be exceeded). Once established, the TMDL is allocated among current and future dischargers into the water body. Direct discharges of pollutants into waters of the United States are not allowed except in accordance with the NPDES program established in Section 402 of the CWA.

Clean Water Act, Section 303, List of Impaired Water Bodies. The State Water Resource Control Board (SWRCB), in compliance with Section 303(d) of the CWA, prepares a list of impaired and threatened waters (e.g., stream/river segments, lakes). States are required to submit their list for USEPA approval every two years. For each water on the list, the state identifies the pollutant causing the impairment, when known. In addition, the state assigns a priority for development of TMDLs based on the severity of the pollution and the sensitivity of the uses for which the waters are being used, among other factors.

In general, once a water body has been added to a state's list of impaired waters, it stays there until the state develops a TMDL and USEPA approves it. USEPA reporting guidance provides a way to keep track of a state's water bodies, from listing as impaired to meeting water quality standards. This tracking system contains a running account of all of the state's water bodies and categorizes each based on the attainment status. The 2024 California Integrated Report was partially approved and partially disapproved by USEPA on December 13, 2024. The USEPA approved the majority of the 303(d) list but identified 53 waterbody-pollutant combinations they are considering adding to the 303(d) list. The 2024 California Integrated Report is the current integrated report except for the 53 waterbody-pollutant combinations in review by USEPA.[21]

National Flood Insurance Act. Congress acted to reduce the costs of disaster relief by passing the National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973. The intent of these acts was to reduce the need for large, publicly funded flood control structures and disaster relief efforts by restricting development in floodplains. The Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program (NFIP) to provide subsidized flood insurance to communities that comply with FEMA regulations limiting development in a floodplain. FEMA issues Flood Insurance Rate Maps (FIRMs) of communities participating in the NFIP. These maps delineate flood hazard zones in the community. If a proposed project would affect the hydrologic or hydraulic characteristics of a flooding source and result in the modification of an existing regulatory floodway, the effective Base Flood Elevations, or the Special Flood Hazard Area, FEMA may comment on the project in the form of a Conditional Letter of Map Revision (CLOMR). The letter does not revise an effective NFIP map but indicates whether the project, if built as proposed, would be recognized by FEMA. FEMA will issue a Letter of Map Revision (LOMR) to officially revise the current NFIP map to show changes to floodplains, regulatory floodways, or flood elevations. Because a LOMR officially revises the effective FIRM, the flood hazard updates shown are used to rate flood insurance policies and enforce flood insurance and development requirements.

4.10.4.2 State Regulations

Porter-Cologne Water Quality Control Act of 1970. The CWA places the primary responsibility for the control of water pollution and planning the development and use of water resources with the states, although it does establish certain guidelines for the states to follow in developing their programs.

[21] State Water Resources Control Board. 2024. *2024 California Integrated Report.* Website: https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2024-integrated-report.html (accessed April 2025).

California's primary statute governing water quality and water pollution is the Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act). The Porter-Cologne Act grants the SWRCB and the nine RWQCBs broad powers to protect water quality and is the primary vehicle for the implementation of California's responsibility under the CWA. The Porter-Cologne Act grants the SWRCB and RWQCBs the authority and responsibility to adopt plans and policies, to regulate discharges to surface water and groundwater, to regulate waste disposal sites, and to require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, oil, or petroleum product.

Each RWQCB must formulate and adopt a water quality plan for its region. The regional plans are to conform to the policies set forth in the Porter-Cologne Act and established by the SWRCB in its State water policy. The Porter-Cologne Act also provides that an RWQCB may include in its region a regional plan with water discharge prohibitions applicable to particular conditions, areas, or types of waste. The City of West Sacramento, including the project site, is within the jurisdictional boundaries of the Central Valley RWQCB (Region 5).

State Water Resources Control Board and Regional Water Quality Control Boards. The SWRCB adjudicates water rights, sets water pollution control policy, issues water board orders on matters of statewide application, and oversees water quality functions throughout the State by approving Basin Plans, TMDLs, and NPDES permits. RWQCBs are responsible for protecting beneficial uses of water resources within their regional jurisdiction using planning, permitting, and enforcement authorities to meet this responsibility.

NPDES Program. Section 402(p) of the CWA requires the issuance of NPDES permits for five categories of stormwater dischargers, including MS4s. The USEPA defines an MS4 as "any conveyance or system of conveyances (roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, human-made channels, and storm drains) owned or operated by a state, city, town, county, or other public body having jurisdiction over stormwater, which are designed or used for collecting or conveying stormwater." The SWRCB or the RWQCB issues NPDES permits for five years, and permit requirements remain active until a new permit has been adopted.

California Toxics Rule (CTR). As stated previously, because California had not established a complete list of acceptable water quality criteria for toxic pollutants, USEPA Region IX established numeric water quality criteria for toxic constituents in the form of the CTR. The CTR provides water quality criteria for certain potentially toxic compounds for inland surface waters, enclosed bays, estuaries, and waters designated for human health or aquatic life uses. The CTR is often used by the RWQCBs when establishing water quality objectives and TMDLs. Although the CTR criteria do not apply directly to discharges of storm water runoff, they are utilized as benchmarks for toxics in urban runoff. The CTR is used as a benchmark to evaluate the potential ecological impacts of storm water runoff to receiving waters. The CTR establishes acute and chronic surface water quality standards for certain water bodies. Acute criteria provide benchmarks for the highest permissible concentration below which aquatic life can be exposed for short periods of time without negative effects. Chronic criteria provide benchmarks for an extended period of time (i.e., four days or more) without negative effects. The acute CTR criteria have a shorter relevant averaging period (less than four days) and provide a more appropriate benchmark for comparison for storm water flows.

CTR criteria apply to the receiving water body and are calculated based on the probable hardness values of the receiving waters. At higher hardness values for receiving waters, certain constituents (including copper, lead, and zinc) are more likely to be complexed (bound with) components in the water column. This in turn reduces the bioavailability and resulting potential toxicity of these metals.

General Construction Activity Storm Water Permit. The *NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. WQ 2022-0057-DWQ, NPDES No. CAS000002* (Construction General Permit),[22] adopted by the SWRCB, regulates construction activity that includes clearing, grading, and excavation resulting in soil disturbance of at least one acre of total land area. The Construction General Permit authorizes the discharge of storm water to surface waters from construction activities.

The Construction General Permit requires that all developers of land where construction activities will occur over more than one acre do the following:

- Complete a Risk Assessment to determine pollution prevention requirements pursuant to the three risk levels established in the General Permit;
- Eliminate or reduce non-storm water discharges to storm sewer systems and other waters of the United States;
- Develop and implement a Storm Water Pollution Prevention Plan (SWPPP) that specifies BMPs that will reduce pollution in storm water discharges to the Best Available Technology/ Economically Achievable/Best Conventional Pollutant Control Technology standards;
- Perform inspections and maintenance of all BMPs; and
- Conduct storm water sampling, if required based on risk level.

To obtain coverage under the Construction General Permit, a Project Applicant must electronically file all permit registration documents with the SWRCB prior to the start of construction. Permit registration documents must include a:

- Notice of Intent (NOI);
- Risk Assessment;
- Site map;
- SWPPP;
- Annual fee; and
- Signed certification statement.

[22] State Water Resources Control Board (SWRCB). 2022. National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. WQ 2022-0057-DWQ, NPDES No. CAS000002. September 8. Effective September 1, 2023.

Typical BMPs contained in SWPPPs are designed to minimize erosion during construction, stabilize construction areas, control sediment, and control pollutants from construction materials. The SWPPP must also include a discussion of the program to inspect and maintain all BMPs.

Stormwater Program, Statewide Trash Provisions. The Statewide Trash Control Program is part of the SWRCB's effort to reduce trash in California's waters, specifically focusing on improving water quality by addressing the problem of trash pollution in stormwater runoff. This program, also known as the Statewide Trash Amendments or the Statewide Trash Policy, applies to all municipal separate storm sewer system (MS4), industrial, and construction NPDES permittees. The goal of the Statewide Trash Policy is to eliminate trash from California's waterways and to ensure compliance with water quality standards, protecting aquatic ecosystems and public health. This policy mandates that dischargers (municipalities, industries, etc.) prevent trash from entering stormwater systems and water bodies.

Groundwater Management Act (Assembly Bill 3030). The Groundwater Management Act (California Water Code, Sections 10750–10756) provides a systematic procedure for an existing local agency to develop a groundwater management plan. Assembly Bill (AB) 3030 allows a local agency whose service includes a groundwater basin that is not already subject to groundwater management pursuant to law or court order to adopt and implement a groundwater management plan and includes plans to mitigate overdraft conditions, control brackish water, and to monitor and replenish groundwater.

Sustainable Groundwater Management Act. The Sustainable Groundwater Management Act (SGMA) of 2014 is a comprehensive three-bill package that Governor Jerry Brown signed into California State law in September 2014. The SGMA provides a framework for sustainable management of groundwater supplies by local authorities, with a limited role for State intervention if necessary to protect the resource. The plan is intended to ensure a reliable groundwater supply for California for years to come.

The SGMA requires governments and water agencies of high- and medium-priority basins to halt overdrafts of groundwater basins. The SGMA requires the formation of local groundwater sustainability agencies (GSAs) that are required to adopt Groundwater Sustainability Plans to manage the sustainability of the groundwater basins.

Cobey-Alquist Flood Plain Management Act (Sections 8000–9651 of the California Water Code). The Cobey-Alquist Flood Management Act states that a large portion of land resources of the State of California is subject to recurrent flooding. The public interest necessitates sound development of land use, as land is a limited, valuable, and irreplaceable resource, and the floodplains of the State are a land resource to be developed in a manner that, in conjunction with economically justified structural measures for flood control, would result in prevention of loss of life and of economic loss caused by excessive flooding. The primary responsibility for planning, adoption, and enforcement of land use regulations to accomplish floodplain management rests with local levels of government. It is policy of the State of California to encourage local government to plan land use regulations to accomplish floodplain management and to provide State assistance and guidance. As part of its discretionary review process, the city must determine how the project will comply with this act and not create flooding impacts on new occupied land uses.

4.10.4.3 Regional Regulations

Water Quality Control Plans (Basin Plans). The Central Valley RWQCB has adopted a Water Quality Control Plan for the Sacramento and San Joaquin River Basins (Basin Plan) that delineates water resource area boundaries based on hydrological features. For the purposes of achieving and maintaining water quality protection, specific beneficial uses have been identified for each of the surface waters and groundwater management zones described in the Basin Plan. Once beneficial uses are designated, appropriate water quality objectives can be established, and programs that maintain or enhance water quality can be implemented to ensure the protection of beneficial uses.

Beneficial uses of surface receiving waters for the project site are shown in **Table 4.10.A: Receiving Water Beneficial Uses.** As shown in **Table 4.10.A**, beneficial uses of surface receiving waters for the project site include: municipal and domestic supply (MUN), agricultural supply (AGR), industrial process supply (PROC), Industrial Service Supply (IND), hydropower generation (POW), water contact recreation (REC-1), non-contact water recreation (REC-2), warm freshwater habitat (WARM), cold freshwater habitat (COLD), migration of aquatic organisms (MIGR), spawning, reproduction, and/or early development (SPWN), wildlife habitat (WILD), and navigation (NAV).

Table 4.10.A: Receiving Water Beneficial Uses

Beneficial Use		Sacramento River (below Chico)	Other Lakes and Reservoirs within the Sacramento River Basin	Sacramento-San Joaquin Delta
MUN	Municipal and Domestic Supply		X	X
AGR	Irrigation	X	X	X
	Stock Watering	X	X	X
PROC			X	X
IND	Service Supply			X
POW			X	
REC-1	Contact	X	X	X
	Canoeing and Rafting[1]	X		
REC-2	Other Noncontact		X	X
WARM[2]		X	X	X
COLD[2]		X	X	X
MIGR	Warm[3]			X
	Cold[4]	X		X
SPWN	Warm[3]	X		X
	Cold[4]		X	
WILD	Wildlife Habitat	X	X	X
NAV				X

Source: The Water Quality Control Plan (Basin Plan) for the California Regional Water Quality Control Board Central Valley Region, Fifth Edition, revised February 2019, the Sacramento River Basin and the San Joaquin River Basin.

[1] Shown for streams and rivers only with the implication that certain flows are required for this beneficial use.

[2] Resident does not include anadromous. Any Segments with both COLD and WARM beneficial use designations will be considered COLD water bodies for the application of water quality objectives.

[3] Striped bass, sturgeon, and shad.

[4] Salmon and steelhead.

AGR = Agricultural Supply
IND = Industrial Service Supply
MUN = Municipal and Domestic Supply
POW = Hydropower Generation
PROC = Industrial Process Supply
REC-1 = Water Contact Recreation
REC-2 = Non-contact Water Recreation
COLD = Cold Freshwater Habitat
MIGR = Migration of Aquatic Organisms
NAV = Navigation
SPWN = Spawning, Reproduction, and/or Early Development
WARM = Warm Freshwater Habitat
WILD = Wildlife Habitat
X = existing uses

According to the Basin Plan, all groundwaters in the Central Valley Region are considered suitable or potential suitable for municipal and domestic water supply (MUN), agricultural supply (AGR0, industrial service supply IND), and industrial process supply (PRO).

Basin Plans also establish implementation programs to achieve water quality objectives to protect beneficial uses and require monitoring to evaluate the effectiveness of the programs. These objectives must comply with the State antidegradation policy (State Board Resolution No. 68-16), which is designed to maintain high-quality waters while allowing some flexibility if beneficial uses are not unreasonably affected.

Basin Plans have established narrative and numeric water quality objectives for inland surface streams and groundwater. If water quality objectives are exceeded, the RWQCBs can use their regulatory authority to require municipalities to reduce pollutant loads to the affected receiving waters. Relevant surface water quality objectives for all inland surface waters, bays and estuaries, and groundwater under the jurisdiction of the Central Valley RWQCB that are applicable to the receiving waters for the project site are shown in **Table 4.10.B: Surface Water Objectives.**

Table 4.10.B: Surface Water Objectives

Constituent	Central Valley RWQCB Basin Plan Objectives
Bacteria	In waters designated for contact recreation (REC-1), the fecal coliform concentration based on a minimum of not less than five samples for any 30-day period shall not exceed a geometric mean of 200/100 ml, nor shall more than ten percent of the total number of samples taken during any 30-day period exceed 400/100 ml.
Biostimulatory Substances	Water shall not contain biostimulatory substances which promote aquatic growths in concentrations that cause nuisance or adversely affect beneficial uses.
Chemical Constituents	Waters shall not contain chemical constituents in concentrations that adversely affect beneficial uses.[1] The chemical constituent objectives apply to the water bodies specified in the table below. Metal objectives in the table are dissolved concentrations. Selenium, molybdenum, and boron objectives are total concentrations. Water quality objectives are also contained in the Water Quality Control Plan for the San Francisco Bay/Sacramento San Joaquin River Delta, adopted by the State Water Board in May 1995 and revised in 2006. At a minimum, water designated for use as domestic or municipal supply (MUN) shall not contain concentrations of chemical constituents in excess of the maximum contaminant levels (MCLs) specified in the following provisions of Title 22 of the CCR, which are incorporated by reference into this plan: Tables 64431-A (Inorganic Chemicals) and 64431-B (Fluoride) of Section 64431, Table 64444-A (Organic Chemicals) of Section 64444, and Tables 64449-A (Secondary Maximum Contaminant Levels-Consumer Acceptance Limits) and 64449-B (Secondary Maximum Contaminant Levels-Ranges) of Section 64449. This incorporation-by-reference is prospective, including future changes to the incorporated provisions as the changes take effect. At a minimum, water designated for use as domestic or municipal supply (MUN) shall not contain lead in excess of 0.015 mg/l. The Regional Water Board acknowledges that specific treatment requirements are imposed by state and federal drinking water regulations on the consumption of surface waters under specific circumstances. To protect all beneficial uses the Regional Water Board may apply limits more stringent than MCLs.

Table 4.10.B: Surface Water Objectives

<table>
<tr><th>Constituent</th><th>Central Valley RWQCB Basin Plan Objectives</th></tr>
<tr><td></td><td>
<table>
<tr><th>Constituent</th><th>Maximum Concentration[a] (mg/l)</th><th>Applicable Water Bodies</th></tr>
<tr><td>Arsenic</td><td>0.01</td><td>Sacramento River from Keswick Dam to the I Street Bridge at City of Sacramento; American River from Folsom Dam to the Sacramento River; Folsom Lake; and the Sacramento-San Joaquin Delta.</td></tr>
<tr><td>Barium</td><td>0.1</td><td>As noted above for Arsenic.</td></tr>
<tr><td>Copper</td><td>0.01</td><td>As noted above for Arsenic.</td></tr>
<tr><td>Cyanide</td><td>0.01</td><td>As noted above for Arsenic.</td></tr>
<tr><td>Iron</td><td>0.3</td><td>As noted above for Arsenic.</td></tr>
<tr><td>Manganese</td><td>0.05</td><td>As noted above for Arsenic.</td></tr>
<tr><td>Silver</td><td>0.01</td><td>As noted above for Arsenic.</td></tr>
<tr><td>Zinc</td><td>0.1</td><td>As noted above for Arsenic.</td></tr>
</table>
[a] Metal objectives in this table are dissolved concentrations. Selenium, molybdenum, and boron objectives are total concentrations.
</td></tr>
<tr><td>Cryptosporidium and Giardia</td><td>Waters shall not contain Cryptosporidium and Giardia in concentrations that adversely affect the public water system component[2] of the MUN beneficial use. This narrative water quality objective for Cryptosporidium and Giardia shall be applied within the Sacramento-San Joaquin Delta and its tributaries below the first major dams (shown in Figure A44-1) and should be implemented as specified in Chapter 4 of the Basin Plan. Compliance with this objective will be assessed at existing and new public water system intakes.</td></tr>
<tr><td>Color</td><td>Water shall be free of discoloration that causes nuisance or adversely affects beneficial uses.</td></tr>
<tr><td>Dissolved Oxygen</td><td>Within the legal boundaries of the Delta, the dissolved oxygen concentration shall not be reduced below:
7.0 mg/l in the Sacramento River (below the I Street Bridge) and in all Delta waters west of the Antioch Bridge; 6.0 mg/l in the San Joaquin River (between Turner Cut and Stockton, 1 September through 30 November); and 5.0 mg/l in all other Delta waters except for those bodies of water which are constructed for special purposes and from which fish have been excluded or where the fishery is not important as a beneficial use.
For surface water bodies outside the legal boundaries of the Delta, the monthly median of the mean daily dissolved oxygen (DO) concentration shall not fall below 85 percent of saturation in the main water mass, and the 95 percentile concentration shall not fall below 75 percent of saturation. The dissolved oxygen concentrations shall not be reduced below the following minimum levels at any time:
Waters designated WARM 5.0 mg/l
Waters designated COLD 7.0 mg/l
Waters designated SPWN 7.0 mg/</td></tr>
<tr><td>Floating Material</td><td>Water shall not contain floating material in amounts that cause nuisance or adversely affect beneficial uses.</td></tr>
<tr><td>Methylmercury</td><td>For the Sacramento-San Joaquin Delta and Yolo Bypass waterways listed in Appendix 43 of the Basin plan, the average methylmercury concentrations shall not exceed 0.08 and 0.24 mg methylmercury/kg, wet weight, in muscle tissue of trophic level 3 and 4 fish, respectively (150-500 mm total length). The average methylmercury concentrations shall not exceed 0.03 mg methylmercury/kg, wet weight, in whole fish less than 50 mm in length. Compliance with the methylmercury fish tissue objectives shall be determined by analysis of fish tissue as described in Chapter 5, Surveillance and Monitoring, of the Basin Plan.</td></tr>
</table>

Table 4.10.B: Surface Water Objectives

<table>
<tr><th>Constituent</th><th>Central Valley RWQCB Basin Plan Objectives</th></tr>
<tr><td>Oil and Grease</td><td>Waters shall not contain oils, greases, waxes, or other materials in concentrations that cause nuisance, result in a visible film or coating on the surface of the water or on objects in the water, or otherwise adversely affect beneficial uses.</td></tr>
<tr><td>pH</td><td>The pH shall not be depressed below 6.5 nor raised above 8.5.</td></tr>
<tr><td>Pesticides</td><td>

No individual pesticide or combination of pesticides shall be present in concentrations that adversely affect beneficial uses.
Discharges shall not result in pesticide concentrations in bottom sediments or aquatic life that adversely affect beneficial uses.
Total identifiable persistent chlorinated hydrocarbon pesticides shall not be present in the water column at concentrations detectable within the accuracy of analytical methods approved by the Environmental Protection Agency or the Executive Officer.
Pesticide concentrations shall not exceed those allowable by applicable antidegradation policies (see State Water Resources Control Board Resolution No. 68-16 and 40 C.F.R. Section 131.12.).
Pesticide concentrations shall not exceed the lowest levels technically and economically achievable.
Waters designated for use as domestic or municipal supply (MUN) shall not contain concentrations of pesticides in excess of the Maximum Contaminant Levels set forth in CCR, Title 22, Division 4, Chapter 15
Waters designated for use as domestic or municipal supply (MUN) shall not contain concentrations of thiobencarb in excess of 1.0 µg/l.

Pesticide concentrations shall not exceed the levels identified in Table 3-4. Where more than one objective may be applicable, the most stringent objective applies.

For the purposes of this objective, the term pesticide shall include: (1) any substance, or mixture of substances which is intended to be used for defoliating plants, regulating plant growth, or for preventing, destroying, repelling, or mitigating any pest, which may infest or be detrimental to vegetation, man, animals, or households, or be present in any agricultural or nonagricultural environment whatsoever, or (2) any spray adjuvant, or (3) any breakdown products of these materials that threaten beneficial uses. Note that discharges of "inert" ingredients included in pesticide formulations must comply with all applicable water quality objectives.
</td></tr>
<tr><td></td><td>
<table>
<tr><th>Pesticide</th><th>Maximum Concentration and Averaging Period</th><th>Applicable Water Bodies</th></tr>
<tr><td>Chlorpyrifos</td><td>0.025 µ g/L; 1-hour average (acute)
0.015 µ g/L; 4-day average (chronic)
Not to be exceeded more than once in a three year period.</td><td>San Joaquin River from Mendota Dam to Vernalis (Reaches include Mendota Dam to Sack Dam, Sack Dam to Mouth of Merced River, Mouth of Merced River to Vernalis, Delta Waterways listed in Appendix 42 of the Basin Plan. Sacramento River from Shasta Dam to Colusa Basin Drain and the Sacramento River from the Colusa Basin Drain to I Street Bridge. Feather River from Fish Barrier Dam to Sacramento River.</td></tr>
</table>
</td></tr>
</table>

Table 4.10.B: Surface Water Objectives

<table>
<tr><th>Constituent</th><th colspan="3">Central Valley RWQCB Basin Plan Objectives</th></tr>
<tr><td></td><td colspan="3">
<table>
<tr><td></td><td></td><td>Bear Creek (San Joaquin and Calaveras Counties), Bear River, Lower (below Camp Far West Reservoir), Berenda Creek (Madera County), Berenda Slough (Madera County), Colusa Basin Drain, Coon Creek, Lower (Sutter County), Deadman Creek (Merced County), Del Puerto Creek, Dry Creek (tributary to Tuolumne River at Modesto, E Stanislaus County), Duck Creek (San Joaquin County), French Camp Slough, Gilsizer Slough, Ingram Creek, Jack Slough, Live Oak Slough, Lone Tree Creek, Main Drainage Canal (Butte County), Merced River, Lower (McSwain Reservoir to San Joaquin River), Mormon Slough (from Stockton Diverting Canal to Bellota Weir), Morrison Slough (Sutter County), Orestimba Creek, Pixley Slough (San Joaquin County), Salt Slough, Spring Creek (Colusa County), Stanislaus River, Lower (Goodwin Dam to San Joaquin River), Tuolumne River, Lower (Don Pedro Dam to San Joaquin River), Ulatis Creek (Solano County), Wadsworth Canal, Westley Wasteway (Stanislaus County), Winters Canal (Yolo County), Yankee Slough (Placer and Sutter Counties)

Waters with designated or existing[a] WARM and/or COLD beneficial uses that are not upstream of the major dams.</td></tr>
<tr><td>Diazinon</td><td>0.16 µ g/L; 1-hour average (acute)
0.10 µ g/L; 4-day average (chronic)
Not to be exceeded more than once in a three year period.</td><td>As noted above for chlorpyrifos.</td></tr>
</table>
[a] Existing as defined in Title 40 of the Code of Federal Regulations, section 131.3(e)
</td></tr>
<tr><td>Radioactivity</td><td colspan="3">Radionuclides shall not be present in concentrations that are harmful to human, plant, animal or aquatic life nor that result in the accumulation of radionuclides in the food web to an extent that presents a hazard to human, plant, animal or aquatic life. At a minimum, waters designated for use as domestic or municipal supply (MUN) shall not contain concentrations of radionuclides in excess of the maximum contaminant levels (MCLs) specified in Table 64442 of Section 64442 and Table 64443 of Section 64443 of Title 22 of the CCR, which are incorporated by reference into this plan. This incorporation-by-reference is prospective, including future changes to the incorporated provisions as the changes take effect</td></tr>
</table>

Table 4.10.B: Surface Water Objectives

<table>
<tr><th>Constituent</th><th>Central Valley RWQCB Basin Plan Objectives</th></tr>
<tr><td>Salinity</td><td>Electrical Conductivity and Total Dissolved Solids, Special Cases in the Sacramento and San Joaquin River Basins Other Than the Delta: The objectives for electrical conductivity and total dissolved solids in the table below apply to the water bodies specified. To the extent of any conflict with the general Chemical Constituents water quality objectives, the more stringent shall apply, with the exception of the electrical conductivity water quality objectives for Reach 83 of the San Joaquin River, which the Board has determined to be protective of all beneficial uses within Reach 83.

<table>
<tr><th>Parameter</th><th>Water Quality Objectives</th><th>Applicable Water Bodies</th></tr>
<tr><td>Electrical Conductivity (at 25°C)</td><td>Shall not exceed 230 micromhos/cm (50 percentile) or 235 micromhos/cm (90 percentile) at Knights Landing above Colusa Basin Drain; or 240 micromhos/cm (50 percentile) or 340 micromhos/cm (90 percentile) at I Street Bridge, based upon previous 10 years of record.</td><td>Sacramento River</td></tr>
</table>

Electrical Conductivity, Total Dissolved Solids, and Chloride, Delta Waters: See the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary, 2006, for salinity objectives applicable in the Delta.</td></tr>
<tr><td>Sediment</td><td>The suspended sediment load and suspended sediment discharge rate of surface waters shall not be altered in such a manner as to cause nuisance or adversely affect beneficial uses.</td></tr>
<tr><td>Settleable Material</td><td>Waters shall not contain substances in concentrations that result in the deposition of material that causes nuisance or adversely affects beneficial uses.</td></tr>
<tr><td>Suspended Material</td><td>Waters shall not contain suspended material in concentrations that cause nuisance or adversely affect beneficial uses.</td></tr>
<tr><td>Tastes and Odors</td><td>Water shall not contain taste- or odor-producing substances in concentrations that impart undesirable tastes or odors to domestic or municipal water supplies or to fish flesh or other edible products of aquatic origin, or that cause nuisance, or otherwise adversely affect beneficial uses.</td></tr>
<tr><td>Temperature</td><td>The natural receiving water temperature of intrastate waters shall not be altered unless it can be demonstrated to the satisfaction of the Regional Water Board that such alteration in temperature does not adversely affect beneficial uses. Temperature objectives for COLD interstate waters, WARM interstate waters, and Enclosed Bays and Estuaries are as specified in the Water Quality Control Plan for Control of Temperature in the Coastal and Interstate Waters and Enclosed Bays of California including any revisions. There are also temperature objectives for the Delta in the State Water Board's 2006 Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary. At no time or place shall the temperature of COLD or WARM intrastate waters be increased more than 5°F above natural receiving water temperature. In determining compliance with the water quality objectives for temperature, appropriate averaging periods may be applied provided that beneficial uses will be fully protected.</td></tr>
<tr><td>Toxicity</td><td>All waters shall be maintained free of toxic substances in concentrations that produce detrimental physiological responses in human, plant, animal, or aquatic life. This objective applies regardless of whether the toxicity is caused by a single substance or the interactive effect of multiple substances. Compliance with this objective will be determined by analyses of indicator organisms, species diversity, population density, growth anomalies, and biotoxicity tests of appropriate duration or other methods as specified by the Regional Water Board.

The Regional Water Board will also consider all material and relevant information submitted by the discharger and other interested parties and numerical criteria and guidelines for toxic substances developed by the State Water Board, the OEHHA, the State Water Board Division of</td></tr>
</table>

Table 4.10.B: Surface Water Objectives

Constituent	Central Valley RWQCB Basin Plan Objectives
	Drinking Water Programs, the U.S. Food and Drug Administration, the National Academy of Sciences, the U.S. Environmental Protection Agency, and other appropriate organizations to evaluate compliance with this objective. The survival of aquatic life in surface waters subjected to a waste discharge or other controllable water quality factors shall not be less than that for the same water body in areas unaffected by the waste discharge, or, when necessary, for other control water that is consistent with the requirements for "experimental water" as described in Standard Methods for the Examination of Water and Wastewater, latest edition. As a minimum, compliance with this objective as stated in the previous sentence shall be evaluated with a 96-hour bioassay. In addition, effluent limits based upon acute biotoxicity tests of effluents will be prescribed where appropriate; additional numerical receiving water quality objectives for specific toxicants will be established as sufficient data become available; and source control of toxic substances will be encouraged.
Turbidity	Waters shall be free of changes in turbidity that cause nuisance or adversely affect beneficial uses. Increases in turbidity attributable to controllable water quality factors shall not exceed the following limits: ● Where natural turbidity is less than 1 Nephelometric Turbidity Unit (NTU), controllable factors shall not cause downstream turbidity to exceed 2 ● Where natural turbidity is between 1 and 5 NTUs, increases shall not exceed 1 NTU. ● Where natural turbidity is between 5 and 50 NTUs, increases shall not exceed 20 percent. ● Where natural turbidity is between 50 and 100 NTUs, increases shall not exceed 10 NTUs. ● Where natural turbidity is greater than 100 NTUs, increases shall not exceed 10 percent. In determining compliance with the above limits, appropriate averaging periods may be applied provided that beneficial uses will be fully protected. Exceptions to the above limits will be considered when a dredging operation can cause an increase in turbidity. In those cases, an allowable zone of dilution within which turbidity in excess of the limits may be tolerated will be defined for the operation and prescribed in a discharge permit. For Delta waters, the general objectives for turbidity apply subject to the following: except for periods of storm runoff, the turbidity of Delta waters shall not exceed 50 NTUs in the waters of the Central Delta and 150 NTUs in other Delta waters. Exceptions to the Delta specific objectives will be considered when a dredging operation can cause an increase in turbidity. In this case, an allowable zone of dilution within which turbidity in excess of limits can be tolerated will be defined for the operation and prescribed in a discharge permit.

Source: The Water Quality Control Plan (Basin Plan) for the California Regional Water Quality Control Board Central Valley Region, Fifth Edition, revised February 2019.

[1] This includes drinking water chemical constituents of concern, such as organic carbon.

[2] Public water system as defined in Health and Safety Code, section 116275, subdivision (h).

mg/L = milligrams per liter

The Basin Plan provides water quality objectives that apply to all groundwaters of the Sacramento and San Joaquin River Basins, including the Sacramento Valley Groundwater Basin and the Yolo Groundwater Subbasin, in order to protect these beneficial uses. **Table 4.10.C: Ground Water Quality Objectives,** below, lists the Groundwater Water Quality Objectives that apply to all ground waters in the Sacramento River Basin that would be applicable to the proposed project. These

objectives do not require improvement over naturally occurring background concentrations and are not required by the federal Clean Water Act.

Table 4.10.C: Ground Water Quality Objectives

Constituent	Central Valley RWQCB Basin Plan Objectives
Bacteria	In ground waters used for domestic or municipal supply (MUN) the most probable number of coliform organisms over any seven-day period shall be less than 2.2/100 ml.
Chemical Constituents	Ground waters shall not contain chemical constituents in concentrations that adversely affect beneficial uses. At a minimum, ground waters designated for use as domestic or municipal supply (MUN) shall not contain concentrations of chemical constituents in excess of the maximum contaminant levels (MCLs) specified in the following provisions of Title 22 of the CCR, which are incorporated by reference into this plan: Tables 64431-A (Inorganic Chemicals) and 64431-B (Fluoride) of Section 64431, Table 64444-A (Organic Chemicals) of Section 64444, and Tables 64449-A (Secondary Maximum Contaminant Levels- Consumer Acceptance Limits) and 64449-B (Secondary Maximum Contaminant Levels-Ranges) of Section 64449. This incorporation-by-reference is prospective, including future changes to the incorporated provisions as the changes take effect. At a minimum, water designated for use as domestic or municipal supply (MUN) shall not contain lead in excess of 0.015 mg/l. To protect all beneficial uses, the Regional Water Board may apply limits more stringent than MCLs.
Radioactivity	At a minimum, ground waters designated for use as domestic or municipal supply (MUN) shall not contain concentrations of radionuclides in excess of the maximum contaminant levels (MCLs) specified in Table 4 (MCL Radioactivity) of Section 64443 of Title 22 of the CCR, which are incorporated by reference into this plan. This incorporation-by-reference is prospective, including future changes to the incorporated provisions as the changes take effect.
Tastes and Odors	Ground waters shall not contain taste- or odor-producing substances in concentrations that cause nuisance or adversely affect beneficial uses.
Toxicity	Ground waters shall be maintained free of toxic substances in concentrations that produce detrimental physiological responses in human, plant, animal, or aquatic life associated with designated beneficial use(s). This objective applies regardless of whether the toxicity is caused by a single substance or the interactive effect of multiple substances.

Source: The Water Quality Control Plan (Basin Plan) for the California Regional Water Quality Control Board Central Valley Region, Fifth Edition, revised February 2019.
MCLs = maximum contaminant levels
mg/l = milligram per liter
ml = milliliter
MUN = domestic or municipal supply

Limited Threat Discharge to Surface Waters General Permit. The Central Valley Regional Water Quality Control Board NPDES No. CAG995002, Order No. R5-2022-0006-02 for [Waste Discharge Requirements] WDRs Limited Threat Discharges to Surface Water was recently adopted on December 14, 2023 (Groundwater Discharge Permit). The Groundwater Discharge Permit addresses the potential limited threat wastewater, which includes construction dewatering discharges. In accordance with this permit, all dischargers must comply with all applicable provisions in the relevant Basin Plan, including any prohibitions and water quality objectives governing the discharge. In addition, the discharge of waste may not cause the spread of groundwater contamination.

NPDES Municipal Separate Storm Sewer System (MS4). The Municipal Storm Water Permitting Program regulates stormwater discharges from MS4s. The NPDES MS4 permits are issued in two

phases by the SWRCB and RWQCBs. Phase I MS4 Permits are issued to medium (serving between 100,000 and 250,000 people) and large (serving more than 250,000 people) municipalities. Most of these permits are issued to a group of co-permittees encompassing an entire metropolitan area. The Phase II MS4 Permits are issued to smaller municipalities (populations of less than 100,000 people) and nontraditional small MS4s (e.g., military bases, public campuses, and prison and hospital complexes). The Phase II Small MS4 Permit (Order Water Quality [WQ] No. 2013-00010-WQ, NPDES No. CAS000004, as amended by Order WQ Nos. 2015-0133-EXEC, 2016-0069-EXE, 2017- 0031-DWQ, 2018-0001-EXEC, 2018-0007-EXEC, and 2019-0009-EXEC) covers Phase II permittees statewide and became effective on July 1, 2013. The Phase I and Phase II MS4 Permits require the permittees to develop a stormwater management program and individual dischargers to develop and implement a Storm Water Management Plan. As a small municipality, the City of West Sacramento is a co-permittee under the Phase II MS4 Permit.

City of West Sacramento Stormwater Management Program (SWMP) Planning Document. In compliance with the CWA and NPDES program, the City prepared the City of West Sacramento Stormwater Management Program (SWMP) Planning Document,[23] which includes measures to help reduce the potential for pollutants to enter the storm drain system. As detailed in the SWMP, the city must implement BMPs that reduce pollutants in stormwater to the "maximum extent practicable" (MEP). MEP is the technology-based standard established in CWA Section 402(p)(3)(B)(iii). Technology-based standards establish the level of pollutant reductions that dischargers must achieve. MEP is generally a result of emphasizing pollution prevention and source control BMPs as the first lines of defense in combination with treatment methods, where appropriate. The MEP approach is an ever-evolving, flexible and advancing concept, which considers technical and economic feasibility. The way in which MEP is met may vary among communities. The MEP standard applies to municipalities regulated by the Phase II MS4 Permit. Consistent with USEPA guidance, the Phase II MS4 Permit requires the city to develop and implement six "minimum control measures" (referred to as "program elements" for the SWMP). These six program elements are as follows.

- Public Education and Outreach
- Public Involvement and Participation
- Illicit Discharge
- Construction Activities
- New Development and Redevelopment
- Municipal Operations

Groundwater Sustainability Plan (GSP). The Yolo Groundwater Subbasin is designated by the DWR as a 'high priority' subbasin and is therefore required to comply with SGMA.[24] Surrounding subbasins were also designated as medium and high priority and are required to comply with SGMA. The Yolo Groundwater Subbasin (No. 5-021.67) is located in the southern portion of the Sacramento Valley

[23] City of West Sacramento. 2003. *City of West Sacramento Stormwater Management Program (SWMP) Planning Document*. March.

[24] California Department of Water Resources (DWR). n.d. *SGMA Basin Prioritization Dashboard*. Website: https://gis.water.ca.gov/app/bp-dashboard/final/ (accessed October 2024).

Groundwater Basin primarily within Yolo County. It is bounded on the east by the Sacramento River, on the west by the Coast Range, on the north by Cache Creek, and on the south by Putah Creek.[25]

The Yolo Subbasin Groundwater Agency (YSGA) was formed in 2017 and is charged with planning and implementing the GSP for the Subbasin. The YSGA is made up of 26 members, representing urban, agricultural, and environmental interests, including the City of West Sacramento and Yolo County. The GSP for the Subbasin was adopted on January 24, 2022, and documents monitoring conditions, establishes management criteria to avoid undesirable results, and identifies potential actions that will achieve and maintain sustainable groundwater management by 2042.[26]

4.10.4.4 Local Regulations

City of West Sacramento General Plan 2035 Policy Document. The Public Facilities and Services Element, Natural and Cultural Resources Element, and Safety Element include policies and actions related to the City's water system and stormwater system, water quality in the city, and flood hazards.

The following policies and actions from the Public Facilities and Services Element would apply to the proposed project:

- **Goal PFS-2**: To maintain an adequate level of service in the City's water system to meet the needs of existing and future development while improving water system efficiency.
    - **Policy PFS-2.3**: To minimize the need for the development of new water sources and facilities and to minimize sewer flows, the City shall promote water conservation both in City operations and in private development, including water recycling.
    - **Policy PFS-2.8**: The City shall, through a combination of water development fees and other funding mechanisms, ensure that new development pays its fair share of the costs of water system improvements.
- **Goal PFS-4**: To maintain an adequate level of service in the City's storm drainage system to accommodate runoff from existing and future development, prevent property damage due to flooding, and improve environmental quality.
    - **Policy PFS-4.4**: The City shall, through a combination of drainage improvement fees and other funding mechanisms, ensure that new development pays its fair share of the costs of drainage system improvements.

[25] California Department of Water Resources (DWR). 2004. *Sacramento Valley Groundwater Basin Yolo Subbasin.* February 27.

[26] Yolo Subbasin Groundwater Agency. 2022. *Yolo Subbasin Groundwater Agency 2022 Groundwater Sustainability Plan, Yolo County, CA.* January 24.

- **Policy PFS-4.6**: The City shall require new stormwater drainage facilities to be designed to enhance recreation and habitat and be integrated into existing parks and open space features.
- **Policy PFS-4.8**: The City shall encourage the use of rainwater catchment facilities and improvements where appropriate, cost effective, safe, and environmentally sustainable.
- **Policy PFS-4.9**: The City shall impose appropriate conditions on grading projects performed during the rainy season to ensure that silt is not conveyed to storm drainage systems.
- **Policy PFS-4.10**: The City shall require new development to be designed to prevent the diversion of floodwaters onto neighboring parcels.
- **Policy PFS-4.11**: The City shall require construction of storm drainage improvements, as appropriate, to prevent flooding during periods of heavy rainfall.

The following policies and actions from the Natural and Cultural Resources Element would apply to the proposed project:

- **Goal NCR-4**: To preserve and protect water quality in the City's natural water bodies and drainage systems and the area's groundwater basin.
  - **Policy NCR-4.5**: The City shall not approve new development that has a significant potential for adversely affecting water quality in the city's natural water bodies and drainage systems including the Sacramento River, Deep Water Ship Channel, Lake Washington, or groundwater basin.
  - **Policy NCR-4.6**: The City shall require new development to protect the quality of water resources and natural drainage systems through site design, source controls, runoff reduction measures, BMPs, and Low Impact Development (LID).
  - **Policy NCR-4.7**: The City shall control pollutant sources to natural water bodies and drainage systems from construction activities through the use of stormwater protection measures in accordance with Federal, State, and local regulations such as the City's grading ordinance and NPDES permit.
- **Goal NCR-5**: To preserve and protect West Sacramento's water resources and supply.
  - **Policy NCR-5.3**: The City shall protect and require new development to preserve, where feasible, areas that provide important groundwater recharge and stormwater management benefits such as undeveloped open spaces, natural habitat, riparian corridors, wetlands, and natural drainage areas.
  - **Policy NCR-5.6**: The City shall maintain the Water Efficient Landscaping Ordinance to conserve water through the use of water efficient landscaping and use of recycled/greywater systems.

The following policies and actions from the Safety Element would apply to the proposed project:

- **Goal S-2**: To prevent loss of life, injury, and property damage due to flooding.
    - **Policy S-2.2**: The City shall evaluate and regulate development in areas subject to flooding in accordance with local, State, and Federal requirements to avoid or minimize the risk of flood damage.
    - **Policy S-2.5**: The City shall require, for areas protected by levees, all new developments to include a notice within the deed that the property is protected by flooding from a levee and that the property can be subject to flooding if the levee fails or is overwhelmed.
    - **Policy S-2.9**: The City shall require new development to achieve a minimum of 200-year level of flood protection either through: i) the construction of flood management improvements or other mitigation measures beyond those required by the City's Floodplain Management Ordinance (Title 18 of the Municipal Code); or ii) payment of in-lieu flood management fees.
    - **Policy S-2.11**: The City shall require evaluation of potential flood hazards prior to approval of development projects to determine whether the proposed development is reasonably safe from flooding and consistent with California Department of Water Resources (DWR) Urban Level of Flood Protection Criteria. The City shall not approve new development or a subdivision or enter into a development agreement for any property within a flood hazard zone unless the adequacy of flood protection specific to the area has been demonstrated.
    - **Policy S-2.14**: The City shall require new development, including manufactured homes, within a special flood hazard area designated by FEMA to be constructed to the standards, and elevated and flood proofed consistent with the requirements, outlined in the City's Floodplain Management Ordinance (Title 18 of the Municipal Code).

City of West Sacramento Municipal Code Chapter 13.04. Chapter 13.04 of the City's Municipal Code regulates the City's water and storm drain system.

- **Section 13.04.1180** provides stormwater best management practices to increase on-site rainwater retention and infiltration.
- **Section 13.04.1210** prohibits water waste due to inefficient landscape irrigation, runoff due to low head drainage, overspray, or other similar conditions where water flows onto adjacent property, non-irrigated areas, walks, roadways, parking lots, or structures.
- **Section 15.14.060** requires implementation of operational BMPs on all sites that have the potential to discharge a pollutant to the City's MS4.

City of West Sacramento Municipal Code Chapter 13.10. Chapter 13.10 of the City's Municipal Code regulates stormwater quality and prohibits discharges of pollutants into surface waters unless the discharge is authorized by an NPDES permit.

- **Section 13.10.130** requires compliance with NPDES permit requirements during construction activities and operation, including preparation of a Stormwater Pollution Prevention Plan (SWPPP) in compliance with the Construction General Permit, and prohibits any discharge that would result in or contribute to a violation of the Phase II MS4 Permit.

City of West Sacramento Municipal Code Chapter 15.50. Chapter 15.50 of the City's Municipal Code requires projects provide flooding protection for the 200-year flood event.

- **Section 15.50.060** states that no building permit shall be issued in connection with the construction of any new structure until the applicant for the building permit demonstrates to the satisfaction of the floodplain administrator that: (1) prior to occupancy, the structure will have 200 year flood protection; and (2) any improvements constructed or measures implemented by the applicant to ensure 200 year flood protection will not significantly increase the risk of flooding or the effect of flooding on any adjacent or nearby properties. In addition, this section states that the Project Applicant shall demonstrate compliance with this chapter through the construction of flood management improvements or the payment of in-lieu flood management fees.

City of West Sacramento Municipal Code Chapter 18.12. Chapter 18.12 of the City's Municipal Code regulates development within areas of special flood-hazards in the city.

- **Section 18.12.030** requires full compliance with the terms of City's Floodplain Management Ordinance (Title 18 of the Municipal Code) and other applicable regulations.

City of West Sacramento Municipal Code Chapter 18.20. Chapter 18.20 of the City's Municipal Code details provisions for flood hazard reduction.

- **Section 18.20.010** details standards for construction within areas of special flood-hazards in the city including those related to anchoring, construction materials and methods, and elevation and floodproofing.

4.10.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the proposed project would have a significant adverse impact with respect to hydrology and water quality if it would:

Threshold 4.10.1: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;

Threshold 4.10.2: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;

Threshold 4.10.3: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition

of impervious surfaces, in a manner which would: (i) Result in substantial erosion or siltation on or off site; (ii) Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site; (iii) Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or (iv) Impede or redirect flood flows;

Threshold 4.10.4: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or

Threshold 4.10.5: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

4.10.6 Project Impacts

Threshold 4.10.1: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant With Mitigation Incorporated. The proposed project involves the subdivision of an approximately 60-acre property to create 259 lots for future single-family homes, comprising approximately 34.78 acres of residential development and 15 open space lots totaling 6.65 acres. The open space lots would include a 0.68-acre Central Park, a 0.14-acre parklet at the corner of Marshall Road and Otis Avenue, and 1.81 acres of landscaped lots, including a roundabout, distributed throughout the proposed development to provide greenspace and buffers. Additionally, the open space areas would include a 4.02-acre detention basin, which would also serve as a recreational field during dry seasons. Landscaping, roadway, and utility improvements would be installed within the project site.

Construction. Pollutants of concern during construction include sediment, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. During construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and sedimentation compared to existing conditions. In addition, chemicals, liquid products, petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste may be spilled or leaked during construction. Sediment from increased soil erosion and chemicals from spills and leaks have the potential to be transported via storm water runoff into receiving waters (i.e., Sacramento River, Sacramento-San Joaquin Delta, and Suisun Bay).

It is assumed that the entire project site would be disturbed during grading and construction activities. Because construction of the proposed project would disturb greater than one acre of soil, the proposed project would be subject to the requirements of the SWRCB's Construction General Permit. The proposed project would also be required to comply with Section 13.10.130 of the City's Municipal Code, mandating projects obtain coverage under applicable NPDES permits. As specified in **Regulatory Compliance Measure WQ-1** and as required by the Construction General Permit and City Municipal Code, the Construction Contractor would be required to prepare a SWPPP and during construction activities, implement construction BMPs detailed in the SWPPP. Construction BMPs

would include, but not be limited to, erosion and sediment control (designed to minimize erosion and retain sediment on site), and good housekeeping practices to prevent spills, leaks, and discharge of construction debris and waste into receiving waters.

According to the Geotechnical Engineering Report prepared for the proposed project (see **Appendix E**), groundwater was not encountered during explorations to depths of five to seven feet bgs. In addition, the Geotechnical Engineering Report reviewed available groundwater data from the DWR. Groundwater well data for State Well No. 08N04E18L001M, located approximately 0.15 mile west of the project site, indicated that the groundwater elevation ranges from approximately one to 11 feet bgs at the well location. Excavation during construction of the proposed project is expected to extend to a maximum depth of 11 feet bgs. Excavation activities may encounter groundwater and groundwater dewatering may be required during project construction. Groundwater dewatering activities could affect surface water quality through the discharge of polluted groundwater to surface water bodies. As specified in **Regulatory Compliance Measure WQ-2**, groundwater dewatering activities would comply with the Central Valley RWQCB's Groundwater Discharge Permit. In compliance with the requirements of the Groundwater Discharge Permit, groundwater would be tested and treated (if necessary) prior to discharge to surface water.

With implementation of **Regulatory Compliance Measures WQ-1** and **WQ-2**, including preparation of a SWPPP, implementation of construction BMPs, and testing and treatment of groundwater prior to discharge to surface water, impacts associated with the violation of water quality standards or WDRs during project construction would be **less than significant**, and no mitigation is required.

Operation. During operation, anticipated pollutants of concern associated with the proposed project include bacterial indicators, metals, nutrients, pesticides, toxic organic compounds, sediments, trash and debris, and oils and grease. Potential sources of these pollutants associated with the proposed project include the following:

- **Bacterial Indicators:** Food wastes, sediment, pavement runoff, and landscaping areas
- **Metals and Toxic Organic Compounds:** Automobiles and surface parking areas
- **Nutrients:** Fertilizers, sediment, and trash/debris
- **Pesticides:** Landscaping activities
- **Sediment:** Disturbed or unstabilized landscaping areas and disturbed earth surfaces
- **Trash and Debris:** Landscaping activities, food wrappers, and food wastes
- **Oil and Grease:** Internal streets and parked vehicles

As previously discussed, the Sacramento River is listed on the most recent USEPA approved 303(d) list (2024) as impaired for pesticides (chlordane, dichlorodiphenyltrichloroethane [DDT], dieldrin, fipronil, and pyrethroids), mercury, polychlorinated biphenyls (PCBs), toxicity, and water temperature.[27] The Central Valley RWQCB has adopted a TMDL implementation plan for chlordane,

[27] State Water Resources Control Board (SWRCB). 2024. C*alifornia 2024 Integrated Report (303(d) List/305(b) Report)*, https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2024-integrated-report.html) (accessed April 30, 2025).

dieldrin, and mercury, which are applicable to the proposed project. Other TMDL implementation plans are anticipated to be completed by 2035. [28]

As previously discussed, the City of West Sacramento is a co-permittee under the Phase II MS4 Permit. The Phase II MS4 Permit require the permittees to develop a stormwater management program and individual dischargers to develop and implement a Storm Water Management Plan. In compliance with the Phase II MS4 Permit, the City prepared the City of West Sacramento Stormwater Management Program (SWMP) Planning Document,[29] which includes measures to help reduce the potential for pollutants to enter the storm drain system. As outlined in the City's SWMP, new development in the city must ensure that post-construction stormwater BMPs that prevent or minimize water quality impacts are incorporated into the project design. The Phase II MS4 Permit also requires the implementation of measures for site design, source control, runoff reduction, storm water treatment, and baseline hydromodification management for regulated projects. Regulated projects include development and redevelopment projects that create and/or replace 5,000 square feet or more of impervious surface area. Because the proposed project would result in the generation of more than 5,000 square feet of impervious surface area, the proposed project is considered a regulated project.

Compliance with the Phase II MS4 Permit and the City's SWMP is achieved through Section 15.14.060 of the City's Municipal Code, which requires implementation of operational BMPs on all sites that have the potential to discharge a pollutant to the City's storm drain system. The proposed project would include storm drainage improvements, which would include the installation of new curbs and gutters, curb inlets and catch basins, storm drain manholes throughout the project site, and Low Impact Development (LID) BMPS, including a 4.02-acre detention basin located at the center of the site and a pump station to regulate stormwater flows. Stormwater on the project site would be collected by the proposed storm drain system and conveyed to the detention basin which would treat and temporarily store stormwater before discharging to the existing 24-inch public storm drain in Otis Avenue via the proposed pump station. The storm water discharged to the existing public storm drain in Otis Ave would be released in a controlled way using an outlet orifice structure. In order to demonstrate that operational BMPs in compliance with the Phase II MS4 Permit and the City's SWMP have been adequately prescribed, the proposed project would be required to prepare a Final Post-Construction Standard Plan Worksheet that provides the final site design, source control, runoff reduction, storm water treatment, and baseline hydromodification management measures for the proposed project, as specified in **Regulatory Compliance Measures WQ-3**.

As discussed above, stormwater runoff from the project site collected in the proposed detention basin would be pumped east to discharge to the existing 24-inch public storm drain in Otis Avenue. In the event of pump failure, localized flooding could occur, which could mobilize sediment, debris, oils, metals, or other pollutants and convey them into the City's storm drain system or nearby receiving waters. The discharge of these pollutants into the City's storm drain system or nearby

28 *Ibid.*

29 City of West Sacramento. 2003. *City of West Sacramento Stormwater Management Program (SWMP) Planning Document.* March.

receiving waters could violate water quality standards or waste discharge requirements or otherwise substantially degrade surface water quality, representing a **potentially significant** impact.

To address this potentially significant water quality impact associated with the potential failure of the proposed pump, the proposed project would be required to implement **Mitigation Measure WQ-1**, which requires the Project Applicant design, install, and maintain a backup stormwater pump capable of operating in the event of primary pump failure or power loss.

Because the proposed project does not include any direct infiltration of stormwater at the project site and would instead collect all stormwater from the project site in the proposed detention basin for treatment prior to discharge to the City's storm drain system within Otis Avenue, there is no direct path for pollutants to reach groundwater. However, because the proposed detention pond would be unlined, there is the potential for some infiltration to occur. As discussed above, the proposed project includes site design, source control, runoff reduction, storm water treatment, and baseline hydromodification management measures, including catch basins and curb inlets with storm filters to capture trash and debris to reduce pollutants of concern in stormwater prior to entering the proposed detention pond. Furthermore, when storm water is infiltrated, soil and plants absorb and filter pollutants and reduce the potential for pollutants of concern to reach groundwater. Therefore, the minimal infiltration of stormwater at the project site due to the unlined detention basin would not result in water quality impacts to groundwater.

As discussed above groundwater well data for State Well No. 08N04E18L001M, located approximately 0.15 mile west of the project site, indicated that the groundwater elevation ranges from approximately one to 11 feet bgs at the well location. Project operation may require occasional groundwater dewatering during wet years due to the hydrologic connection between the proposed detention pond and the water table at the project site. Similar to groundwater dewatering activities during construction activities, groundwater dewatering actives during operation of the proposed project could affect surface water quality through the discharge of polluted groundwater to surface water bodies. However, as specified in **Regulatory Compliance Measure WQ-2**, groundwater dewatering activities would comply with the Central Valley RWQCB's Groundwater Discharge Permit. In compliance with the requirements of the Groundwater Discharge Permit, groundwater would be tested and treated (if necessary) prior to discharge to surface water.

With adherence to **Regulatory Compliance Measures WQ-2** and **WQ-3**, which requires the testing and treatment of groundwater prior to discharge to surface water and adherence to the Phase II MS4 Permit, the City's SWMP, and the City's Municipal Code, including preparation of a Final Post-Construction Standard Plan Worksheet and implementation of operational BMPs to address pollutants of concern in storm water runoff; and implementation of **Mitigation Measure WQ-1**, which requires the installation of a backup stormwater pump, project impacts associated with the violation of water quality standards or WDRs or degradation of surface or groundwater water quality during project operation would be **less than significant with mitigation incorporated**.

Overall, with adherence to **Regulatory Compliance Measures WQ-1** through **WQ-3** and implementation of **Mitigation Measure WQ-1,** project impacts associated with the violation of water quality standards or WDRs or degradation of surface or groundwater water quality during project construction and operation would be **less than significant with mitigation incorporated**.

Threshold 4.10.2: Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. As previously discussed, the project site lies within the boundaries of the Yolo Groundwater Subbasin, which is located in the southern portion of the Sacramento Valley Groundwater Basin. According to the Geotechnical Engineering Report prepared for the proposed project, groundwater was not encountered during explorations to depths of five to seven feet bgs. In addition, groundwater well data for State Well No. 08N04E18L001M, located approximately 0.15 mile west of the project site, indicated that the groundwater elevation ranges from approximately one to 11 feet bgs at the well location.

Construction. Excavation during construction of the proposed project is expected to extend to a depth that may encounter groundwater. Groundwater dewatering may be required during project construction. However, compared to the estimated 14,038,000 acre-feet of groundwater in storage in the Yolo Groundwater Subbasin, the amount of water that would be extracted would not be substantial and would only occur temporarily during construction. Recharge to the Yolo Groundwater Subbasin occurs primarily through seepage from surface waters, including the Sacramento River,[30] and deep percolation.[31] During construction, existing drainage patterns at the project site would generally be maintained and construction activities at the project site would not impede natural infiltration from the Sacramento River. Therefore, construction of the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. Impacts would be **less than significant**, and no mitigation is required.

Operation. The approximately 60-acre project site is currently undeveloped and entirely pervious. Development of the proposed project would convert approximately 45.79 acres of the site to developed uses, including approximately 34.78 acres of residential development and approximately 11.01 acres of streets and related infrastructure, which would decrease the potential for on-site infiltration. However, the proposed project includes landscaped areas, which will provide areas where storm water runoff can collect and continue to infiltrate into the ground. This includes a 4.02-acre detention basin which would treat stormwater and reduce peak stormwater flows before discharging to the existing 24-inch public storm drain in Otis Avenue. The City's storm drain system ultimately discharges into the Sacramento River. Therefore, operation of the proposed project would not substantially impede stormwater flow to the Yolo Groundwater Subbasin as discharge would continue to the Sacramento River. Project operation would not require groundwater dewatering; however, operation of the proposed project would increase water demand at the project site, which would be supplied by the City. According to the City's 2025 UWMP, water supply for West Sacramento is primarily provided by surface waters, wholly derived from the Sacramento River. The City also has access to groundwater supplies, extracted from the Yolo Groundwater Subbasin. At the time of incorporation, the City was using groundwater as the primary source of water to service the regional customers; however, with the development of the City's surface water supplies, the City

30 California Department of Water Resources (DWR). 2004. *Sacramento Valley Groundwater Basin Yolo Subbasin – Bulletin 118*. February 27.

31 City of West Sacramento. n.d. IWFM Groundwater Package(v4-20250.107-8bdd472ec) Groundwater Zone Budget In AF For Zone 9. C2VSim Model R374.

reduced its reliance on its groundwater system and looked to preserve that supply to supplement supply deficits in its surface water system. In the context of the Yolo Groundwater Subbasin Groundwater Authority's work pursuant to the Sustainable Groundwater Management Act (SGMA), the City continues to preserve its groundwater assets and plans to use those assets, as needed, to meet its urban demands. As provided in the 2025 UWMP, the City has sufficient and reliable water supplies to meet forecasted customer water needs through 2050 considering water use forecasts for both normal and dry conditions. Forecasted water needs would be met primarily through surface water supplies, with the use of groundwater supplies only being needed during an emergency. Because the City can rely on existing surface water supplies to meet expected demands, the proposed project would not be expected to use a substantial amount of groundwater during operation, if any. Therefore, operation of the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. Impacts would be **less than significant**, and no mitigation is required.

Overall, project impacts associated with substantially decreasing groundwater supplies or interfering substantially with groundwater recharge during project construction and operation would be **less than significant**, and no mitigation is required.

Threshold 4.10.3: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: (i) Result in substantial erosion or siltation on or off site; (ii) Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site; (iii) Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or (iv) Impede or redirect flood flows?

Less Than Significant Impact. The project site does not currently contain any detention ponds or stormwater drainage collection system. Under existing conditions, stormwater runoff on the project site either infiltrates at the project site, or sheet flows in both an easterly and westerly direction from a localized high point on the project site. Stormwater runoff flowing east would discharge to the existing storm drain facilities along Otis Avenue and stormwater runoff flowing west would be collected by existing stormwater infrastructure associated with the existing residential development located west and southwest of the project site.

With implementation of the proposed project, the project site would be divided into 40 drainage management areas (DMAs) to manage stormwater runoff from the entire project site. The project site would be developed with storm drainage improvements, which would include the installation of new curbs and gutters, curb inlets and catch basins, storm drain manholes throughout the project site, and LID BMPs, including a 4.02-acre detention basin located at the center of the site and a pump station to regulate stormwater flows. Stormwater on the project site would be collected by the proposed 15-inch reinforced concrete (RCP) storm drain system and conveyed to the detention basin which would treat and temporarily store stormwater before discharging to the existing 24-inch public storm drain in Otis Avenue via the proposed pump station. The storm water discharged to the

existing public storm drain in Otis Ave would be released in a controlled way using an outlet orifice structure.

Upon completion of the project, the site would be developed with 259 residential lots, roadways, sidewalks, utility infrastructure, and approximately 6.65 acres of open space consisting of the Central Park, parklet, landscape lots, and the detention basin. For purposes of this analysis, the Drainage Study prepared for the proposed project in April 2026, assumed that approximately 55 percent of the proposed development area would be covered by residential units, walkways, roadways, and other paved surfaces. An increase in impervious surface area increases the rate and volume of runoff during a storm, which can more effectively transport sediments to receiving waters and result in loss of topsoil. However, the proposed project would incorporate the previously noted LID design requirements, in total providing a runoff capture capacity of 25.6 acre-feet, significantly exceeding the minimum required capacity of 2.1 acre-feet for flow treatment. Additionally, the recreational and open space areas within the proposed project, including the recreational elements of the detention basin, park, and landscaped lots would be privately owned and maintained by a future HOA. The Reclamation District No. 900 (RD 900) would maintain the stormwater and drainage components of the detention basin and said maintenance would be funded by the RD 900 property assessments and to RD 900's standards. Therefore, impacts would be **less than significant**, and no mitigation is required.

Threshold 4.10.3(i): Result in substantial erosion or siltation on or off site?

Less Than Significant Impact. During construction activities, soil would be exposed and disturbed, drainage patterns would be temporarily altered during grading and other construction activities, and there would be an increased potential for soil erosion and siltation compared to existing conditions. Additionally, during a storm event, soil erosion and siltation could occur at an accelerated rate. As discussed above under Threshold 4.10.1 and as specified in **Regulatory Compliance Measures WQ-1**, the Construction Contractor would be required to obtain coverage under the Construction General Permit, which requires preparation of a SWPPP. The SWPPP would detail Erosion Control and Sediment Control BMPs to be implemented during construction to minimize erosion and retain sediment on site. With adherence to **Regulatory Compliance Measure WQ-1**, including implementation of construction BMPs, construction impacts related to on-site and off-site erosion or siltation would be **less than significant**, and no mitigation is required.

Development of the proposed project would result in an increase in impervious surface area at the project site (approximately 89 percent of the project site). An increase in impervious surface area increases the rate and volume of runoff during a storm, which can more effectively transport sediments to receiving waters. However, the impervious surface areas on the project site would not be prone to on-site erosion or siltation because there would be no exposed soil. The remaining pervious surfaces on the project site would be landscaped with vegetation that would stabilize the soil and promote infiltration, thereby minimizing on-site erosion and siltation. Additionally, the proposed project would be required to adhere to **Regulatory Compliance Measure WQ-3**, which requires the preparation of a Final Post-Construction Standard Plan Worksheet in compliance with the Phase II MS4 permit and the implementation of site design, source control, runoff reduction, storm water treatment, and LID BMPs that minimize stormwater runoff thereby minimizing on-site erosion and siltation. With adherence to **Regulatory Compliance Measure WQ-3**, operational

impacts related to on-site or off-site erosion or siltation would be **less than significant,** and no mitigation is required.

Threshold 4.10.3(ii): Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site?

***Less Than Significant With Mitigation Incorporated*.** Development of the proposed project would result in an increase in impervious surface area at the project site (approximately 89 percent of the project site). An increase in impervious surface area increases the rate and volume of runoff, which could result in flooding on- or off-site if unmanaged. However, project construction would comply with the requirements of the Construction General Permit and would include the preparation and implementation of a SWPPP pursuant to **Regulatory Compliance Measure WQ-1.** The SWPPP would include construction BMPs (e.g., soil binders, straw mulch, non-vegetative stabilization, fiber rolls, sandbag barrier, straw bale barrier, stabilized construction entrance/exit, stabilized construction roadway, and entrance/outlet tire wash) to control the rate and amount of on-site surface runoff and to direct flows to ensure that storm water runoff from the construction site does not result in on- or off-site flooding. With adherence to **Regulatory Compliance Measure WQ-1**, construction impacts related to a substantial increase in the rate or amount of surface runoff that would result in flooding would be less than significant, and no mitigation is required.

In addition, the proposed LID BMPs (detention basin), which have been designed to be consistent with the requirements of the Phase II MS4 Permit, (**Regulatory Compliance Measure WQ-3**), would capture and detain and discharge stormwater runoff during operation, consistent with the requirements of the Phase II MS4 Permit. Further, as detailed in the Drainage Study (**Appendix G-1**), the sizing of the proposed detention basin was determined by considering the maximum post-development 100-year peak flow values. These peak flows were determined by considering cumulative peak flows from each DMA obtained from the Sacramento Method Analysis and conducting a full-site analysis with the SCS TR-20 Method. The proposed detention basin would be approximately 6 feet deep, with the base at approximately 5 feet and the top at an approximately 11-foot elevation. As determined by the Drainage Study, the peak elevation reached for the 100-year flow is 8.61 feet, providing a freeboard of 2.39 feet. Overall, compliance with the Phase II MS4 Permit**,** as required by **Regulatory Compliance Measure WQ-3,** would ensure that operational activities would not result in a substantial increase in the rate or amount of surface runoff.

As discussed above, stormwater runoff from the project site collected in the proposed detention basin would be pumped east to discharge to the existing 24-inch public storm drain in Otis Avenue. In the event of pump failure, localized flooding could occur, representing a **potentially significant** impact. To address this potentially significant on-site flooding impact associated with the potential failure of the proposed pump, the proposed project would be required to implement **Mitigation Measure WQ-1**, which requires the Project Applicant design, install, and maintain a backup stormwater pump capable of operating in the event of primary pump failure or power loss. Therefore, implementation of **Mitigation Measure WQ-1** would ensure that operational activities would not result in on-site flooding, and impacts would be **less than significant with mitigation incorporated**.

Overall, with adherence to **Regulatory Compliance Measures WQ-1** and **WQ-3 a**nd implementation of **Mitigation Measure WQ-1,** impacts related to substantially increasing the rate or amount of surface runoff in a manner that would result in flooding on or off site would be **less than significant with mitigation incorporated**.

Threshold 4.10.3(iii): Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant with Mitigation Incorporated. Construction of the proposed project has the potential to introduce pollutants to existing stormwater runoff. However, as specified in **Regulatory Compliance Measure WQ-1**, the Construction General Permit requires preparation of a SWPPP and implementation of construction BMPs that target pollutants of concern in runoff from the project site and prevent substantial additional sources of polluted runoff being discharged into receiving waters. The SWPPP would include construction BMPs to control and direct surface runoff on the project site and would include detention measures, if required, to ensure that storm water runoff from the construction activities does not exceed the capacity of the storm water drainage systems. With implementation of **Regulatory Compliance Measure WQ-1**, construction impacts related to the creation or contribution of stormwater runoff that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff would be **less than significant**, and no mitigation is required.

With implementation of the proposed project, stormwater would be conveyed to the proposed 4.02-acre detention basin which would treat and temporarily store stormwater before discharging to the existing 24-inch public storm drain in Otis Avenue via the proposed pump station. The storm water discharged to the existing public storm drain in Otis Ave would be released in a controlled way using an outlet orifice structure. Additionally, existing storm drain inlets along Marshall Road and Otis Avenue would be relocated. The onsite stormwater facilities and detention basin would be appropriately sized to detain the design capture volume (DCV) so that stormwater runoff does not exceed the capacity of the existing stormwater drainage system. In addition, as detailed in the Drainage Study and previously discussed above, the sizing of the proposed detention basin was determined by considering the maximum post-development 100-year peak flow values and has been designed to provide a freeboard of 2.41 feet during the 100-year peak flow event. Further, the Drainage Study confirmed that the that the proposed outlet structure to Otis Avenue has adequate capacity to convey runoff to the existing storm drain in a controlled way and the proposed drainage structure is sufficient to handle 100-year storm peak flow while mitigating peak flows to be less than pre-development flows. Therefore, implementation of the proposed project would not create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems.

Additionally, the proposed project would adhere to **Regulatory Compliance Measure WQ-3**, which requires implementation of operational BMPs that target and reduce pollutants of concern in storm water runoff, and would implement **Mitigation Measure WQ-1**, which requires the Project Applicant design, install, and maintain a backup stormwater pump capable of operating in the event of primary pump failure or power loss. Adherence to and implementation of these measures would ensure that

operation of the proposed project would not provide substantial additional sources of polluted runoff to the City's stormwater drainage system or receiving waters.

With adherence to **Regulatory Compliance Measures WQ-1** and **WQ-3**, and implementation of **Mitigation Measure WQ-1,** operational impacts related to creation or contribution of stormwater runoff that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff would be **less than significant with mitigation incorporated.**

Threshold 4.10.3(iv): Impede or redirect flood flows?

Less Than Significant Impact. As previously discussed, FEMA designates the project site as Zone X, meaning that the project site is within an area protected from the 1-percent-annual-chance (100-year) flood by a levee, dike, or other structures subject to possible failure or overtopping during larger flood. However, according to floodplain mapping in the Sacramento-San Joaquin Valley compiled by the DWR pursuant to SB 5, portions of the project site are within the 200-year flood plain. In addition, the City's General Plan EIR and modeled flood inundation areas for the 200-year flood event indicate that portions of the project site would be inundated during a 200-year flood event (refer to **Figure 4.10-5: 200-Year Flood Event Inundation**).[32] The entire city, including the project site, is also within the natural floodplain of the Sacramento River and is surrounded on all sides by a series of levees designed to provide flood protection. The levees channelize the Sacramento River into a fixed alignment by preventing future channel meandering and separating the channel from its historic floodplain.[33] No portion of the project site is designated as being within a 100-year flood hazard zone and the City's General Plan establishes a 200-year level of flood protection as the standard for the city.

Because the entire city is within the natural floodplain of the Sacramento River, the city could be subject to inundation if the levees were to fail. In addition, portions of the project site could be inundated during a 200-year flood event. Comprehensive evaluation of the City's levee system also revealed several deficiencies that would require substantial improvements to meet current flood protection standards. Work to correct the identified deficiencies in the City's levee system is ongoing, and the magnitude of the flood depth and damage would depend on the location of a levee breach. Specifically, the WSAFCA is implementing the WSLIP and EIPs, which are targeted to reduce flooding risk due to levee failure. The primary goal of WSAFCA and the WSLIP is to achieve at least 200-year flood protection for the city (0.5 percent chance for levee failure in any given year) by 2040; however, the General Plan EIR indicated that it could be many more years until the flood protection goal is achieved.

To date, West Sacramento has completed seven flood risk reduction projects, including the I Street Bridge Project (2008), the Bridge District Levee Maintenance Road Project (2011), the Yolo Bypass South Project (2011), CHP Academy EIP (2011), The Rivers EIP (2011), the Sacramento Bank Project -

[32] City of West Sacramento. 2016. *City of West Sacramento General Plan Update Draft Environmental Impact Report*, Figure 3.9-6, Modeled Flood Inundation Area for the 200-year Event.

[33] City of West Sacramento. 2016. *City of West Sacramento General Plan Update Draft Environmental Impact Report.* August.

South River Road (2015), and the Southport Sacramento River EIP (2018). During the Southport Levee Improvement Project, the West Sacramento Project was authorized by Congress in the *Water Infrastructure Improvements for the Nation Act* and the Southport Setback Levee Project became the first component of the federally authorized project.

WSAFCA was also the lead design for the next flood protection project, the Yolo Bypass East Levee. The Yolo Bypass East Levee was separated into two phases: the Yolo Bypass East Levee-North and the Yolo Bypass East Levee-South. Walkthrough construction of both Yolo Bypass East Levee phases was completed in 2024; however, deficiencies were identified in the Yolo Bypass East Levee-South portion during final inspection and emergency repair work is currently underway (60 percent design). The Yolo Bypass East Levee-North repair included new seepage drainage system and pump station. This project has been constructed and is undergoing final electric inspections.

The repair work for the Yolo Bypass East Levee-South, which is being led by the USACE, is at 60 percent design. In addition, the USACE is currently designing two additional flood protection projects, the Stone Lock Project and the Sacramento River North Levee Project. The Stone Lock Project will achieve 30 percent design in 2026 and the Sacramento West River North Levee Project design is at 65 percent design and construction is anticipated in 2028.

Although the project site is not located within a 100-year flood plain, as designed by FEMA, according to floodplain mapping in the Sacramento-San Joaquin Valley compiled by the DWR pursuant to SB 5, portions of the project site are within the 200-year flood plain. In addition, modeled flood inundation depths of a hypothetical levee failure of the Sacramento River South Levee provided in the City's General Plan EIR indicate that the project site would be inundated with between 9 and 15 feet of water.[34] Therefore, development of the proposed project could impede or redirect flood flows in the event of levee failure.

However, the proposed project would be required to comply with Chapter 15.50 of the City's Municipal Code through the construction of flood management improvements other mitigation measures beyond those set forth in City's Floodplain Management Ordinance (Title 18 of the Municipal Code), or the payment of an in-lieu flood-protection fee, as detailed in **Regulatory Compliance Measure WQ-4**.

In addition, as required by General Plan Policy S-5, the proposed project would be required to include a notice within the deed that alerts future tenants and owners that the project site is protected by flooding from a levee and that the project site could be subject to flooding if the levee fails or is overwhelmed.

With adherence to **Regulatory Compliance Measure WQ-4**, which requires compliance with Chapter 15.50 of the City's Municipal Code, implementation of the proposed project would not substantially

[34] City of West Sacramento. 2016. *City of West Sacramento General Plan Update Draft Environmental Impact Report*, Figure 3.9-5, Modeled Flood Inundation Depths for a Hypothetical Levee Failure in the Southport Area of the City of West Sacramento. August.

increase the rate or amount of surface runoff in a manner that would significantly impede or redirect flood flows. Impacts would be **less than significant**.

Threshold 4.10.4: Would the project be located in a flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Significant and Unavoidable Impact. Impacts related to flood hazards, including potential inundation associated with tsunamis or seiche zones, and the risk of release of pollutants due to project inundation, are discussed below.

Flooding. As discussed under Threshold 4.10.3(ii) above, FEMA designates the project site as Zone X, meaning that the project site is within an area protected from the 1-percent-annual-chance (100-year) flood by a levee, dike, or other structures subject to possible failure or overtopping during larger flood. However, according to floodplain mapping in the Sacramento-San Joaquin Valley compiled by the DWR pursuant to SB 5, portions of the project site are within the 200-year flood plain. In addition, the City's General Plan establishes a 200-year level of flood protection as the standard for the city and indicates that portions of the project site would be inundated during a 200-year flooding event (see **Figure 4.10-5: 200-Year Flood Event Inundation**).[35] Further, the entire city, including the project site, is within the natural floodplain of the Sacramento River and is surrounded on all sides by a series of levees designed to provide flood protection. The levees channelize the Sacramento River into a fixed alignment by preventing future channel meandering and separating the channel from its historic floodplain.[36]

During construction, construction BMPs would be implemented to ensure that during a rain event, pollutants would be retained on site and would be prevented from reaching downstream receiving waters in accordance with **Regulatory Compliance Measure WQ-1**. In addition, if groundwater dewatering is required during construction activities, additional BMPs would be required consistent with the Groundwater Discharge Permit to ensure that floodwaters would not impact the groundwater being pulled and disposed of. Compliance with the Groundwater Discharge Permit is detailed in **Regulatory Compliance Measure WQ-2**.

During operation, the proposed project would generally maintain the existing drainage pattern of the project site, and development would include a detention basin that would ensure that pollutants would be treated and prevented from reaching downstream receiving waters, consistent with the requirements of the Phase II MS4 Permit (**Regulatory Compliance Measure WQ-3)**. The detention basin would treat stormwater by temporarily storing runoff and releasing it at a controlled rate, thereby reducing peak flows and allowing suspended sediments and associated pollutants to settle prior to discharge. While primarily a flow-control measure, detention basins can also provide secondary water-quality benefits through sedimentation and pollutant adsorption.

[35] City of West Sacramento. 2016. C*ity of West Sacramento General Plan Update Draft Environmental Impact Report,* Figure 3.9-6, Modeled Flood Inundation Area for the 200-year Event.

[36] City of West Sacramento. 2016. *City of West Sacramento General Plan Update Draft Environmental Impact Report*. August.

As discussed above, the entire city is within the natural floodplain of the Sacramento River and could be subject to inundation if the levees were to fail. In addition, comprehensive evaluation of the City's levee system revealed several deficiencies that would require substantial improvements to meet current flood protection standards. Work to correct the identified deficiencies in the City's levee system is ongoing, and the magnitude of the flood depth and damage would depend on the location of the levee breach. Specifically, the WSAFCA is implementing EIPs, which are targeted to reduce flooding risk due to levee failure. The end result of the WSLIP would be 200-year flood protection for the city; however, the General Plan EIR indicated that it could be many more years until the flood protection goal is achieved. According to the City's General Plan EIR, modeled flood inundation depths of a hypothetical levee failure of the Sacramento River South Levee indicates that the project site would be inundated with between 9 and 15 feet of water.[37] Inundation of the project site during a flood event could result in the release of pollutants. This impact would be **potentially significant.**

However, as discussed above, the proposed project would be required to comply with Chapter 15.50 of the City's Municipal Code, as detailed in **Regulatory Compliance Measure WQ-4,** by either constructing flood management improvements or other mitigation measures, beyond those set forth in City's Floodplain Management Ordinance (Title 18 of the Municipal Code) or paying the "in-lieu" flood management fee in an amount established by resolution of the city council.

Furthermore, pollutants and hazardous materials located on the project site during project operation would be similar to other residential developments within the city, including the Bridgeport residential development located southwest of the project site, and hazardous materials would be properly stored consistent with the manufacturer's recommendations. Pollutants that could be released due to project site inundation during operation of the proposed project would be similar to other similar development in the city, including the Bridgeport development located directly adjacent to the project site, and would represent a similar risk of release of pollutants. Nevertheless, because the project site is located in a flood hazard zone (i.e., 200-year flood plain as mapped by the DWR pursuant to SB 5) and inundation at the project site could occur during a flood event, the proposed project could result in the release of pollutants due to inundation. In addition, there is no feasible mitigation that could reduce the potential impact to less than significant. Therefore, impacts would be **significant and unavoidable**.

Tsunami. The project site is over 73 miles northeast of the Pacific Ocean, representing a significant distance between the project site and the Pacific Ocean. Based on the distance from the Pacific Ocean, the project site would not be susceptible to inundation from a tsunami and there is no risk of a release of pollutants from the project site. **No impact** related to the risk release of pollutants due to project inundation from a tsunami would occur.

Seiches. Seiches are oscillations in enclosed bodies of water (e.g., a bay, lake, or harbor) that are caused by a number of factors, most often wind or seismic activity. Seiches go up and down or oscillate and do not progress forward like standard ocean waves. The nearest sizeable, enclosed body of water to the project site is Folsom Lake, located approximately 25 miles northeast of the

[37] City of West Sacramento. 2016. *City of West Sacramento General Plan Update Draft Environmental Impact Report*, Figure 3.9-5, Modeled Flood Inundation Depths for a Hypothetical Levee Failure in the Southport Area of the City of West Sacramento. August.

project site. Because the impacts of seiches are highly localized, and all pollutants of concern would be properly stored during construction and operation, the risk of release of pollutants from the project site due to seiche-related flooding would be low. **No impact** related to the risk release of pollutants due to project inundation from a seiche would occur.

Dam Inundation. According to the California Department of Water Resources Division of Safety of Dams, the project site is not located within a dam inundation area.[38] Therefore, the proposed project would not result in the release of pollutants due to flooding caused by dam failure. **No impact** related to the risk release of pollutants due to project inundation from dam failure would occur.

Threshold 4.10.5: Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. The project is within the jurisdiction of the Central Valley RWQCB, which has adopted a Water Quality Control Plan for the Sacramento and San Joaquin River Basins (Basin Plan).[39] which designates beneficial uses for all surface and groundwater within its jurisdiction and establishes the water quality objectives and standards necessary to protect those beneficial uses. As previously discussed, the project would comply with existing NPDES permit requirements, including the Construction General Permit, Groundwater Discharge Permit, and Phase II MS4 Permit, and would implement construction and operational BMPs to reduce pollutants of concern in stormwater runoff as detailed in **Regulatory Compliance Measures WQ-1, WQ-2,** and **WQ-3**. Compliance with these regulatory requirements would ensure that the proposed project would not degrade or alter water quality, which would cause the receiving waters to exceed the water quality objectives or impair the beneficial use of receiving waters. Accordingly, the proposed project would not result in water quality impacts that would conflict with the Basin Plan. Construction and operational impacts related to a conflict with the Basin Plan would be less than significant.

The Sustainable Groundwater Management Act (SGMA) was enacted in September 2014. SGMA requires governments and water agencies of high- and medium-priority basins to halt overdraft of groundwater basins. SGMA requires the formation of local Groundwater Sustainability Agencies (GSAs), which are required to adopt Groundwater Sustainability Plans (GSPs) to manage the sustainability of the groundwater basins. The project site is located within the Yolo Groundwater Subbasin, which is located in the southern portion of the Sacramento Valley Groundwater Basin. The Yolo Groundwater Subbasin is designated by the DWR as a 'high priority' subbasin and is therefore required to comply with SGMA.[40] The Yolo Subbasin Groundwater Agency (YSGA) was formed in 2017 and is charged with planning and implementing the GSP for the Subbasin.

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38 California Department of Water Resources (DWR), Division of Safety of Dams. n.d. *Dam Breach Inundation Map Web Publisher.* Website: https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2 (accessed December 2024).

39 California Regional Water Quality Control Board Central Valley Region (RWQCB). 1975. *The Water Quality Control Plan (Basin Plan) for the California Regional Water Quality Control Board Central Valley Region, Fifth Edition, the Sacramento River Basin and the San Joaquin River Basin*. July. Revised February 2019 with Approved Amendments.

40 California Department of Water Resources (DWR). n.d. SGMA Basin Prioritization Dashboard. Website: https://gis.water.ca.gov/app/bp-dashboard/final/ (accessed October 2024).

The YSGA is made up of 26 members, representing urban, agricultural, and environmental interests, including the City of West Sacramento and Yolo County. The GSP for the Subbasin was adopted on January 24, 2022, and documents monitoring conditions, establishes management criteria to avoid undesirable results, and identifies potential actions that will achieve and maintain sustainable groundwater management by 2042.[41] These actions would be implemented by the members of the YSGA and development of the proposed project would not conflict with or preclude implementation of management actions.

In addition, as previously discussed, the proposed project would not substantially contribute to groundwater depletion as West Sacramento does not use groundwater as water supply. In addition, the proposed project would not interfere with groundwater recharge to the Yolo Groundwater Subbasin as recharge would continue to occur via the Sacramento River.

Therefore, the proposed project would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan, and impacts would be **less than significant**. No mitigation is required.

4.10.7 Cumulative Impacts

Less Than Significant Impact. As defined in Section 15355(b) of the *State CEQA Guidelines*, cumulative impacts refer to the incremental impacts of the project added to other closely related past, present, and reasonably foreseeable probable future projects. The cumulative study area for hydrology and water quality is described in Chapter 4.0; the cumulative project list is provided in Chapter 4.0, **Table 4.A**, and a map of the cumulative project locations is provided in Chapter 4.0, **Figure 4-1**.

For the cumulative analysis related to hydrology and water quality, the cumulative projects being considered include the cumulative projects discharging to the same watersheds as the proposed project (i.e., Sacramento Valley Subregion of the Sacramento River Watershed). Cumulative development in the Sacramento Valley Subregion of the Sacramento River Watershed is a continuation of the existing urban pattern of development that has already resulted in modifications to watercourses and drainage patterns in the area. The area's watercourses have been predominantly channelized, and drainage systems have been put into place to respond to past urbanization that has occurred in this area. Other projects in the Sacramento Valley Subregion of the Sacramento River Watershed could potentially increase the volume of storm water runoff and contribute to pollutant loading in storm water runoff reaching the storm drain system and nearby watercourses thereby resulting in cumulative impacts to hydrology and surface water quality. In addition, the construction and operation of these projects could result in localized degradation of groundwater quality that could eventually impair the underlying aquifer's continued use if pollutant discharge quantities are large enough. Cumulative impacts to groundwater supply could also occur due to increases in impervious surfaces that impair groundwater recharge and increases in consumptive uses of groundwater.

[41] Yolo Subbasin Groundwater Agency. 2022. *Yolo Subbasin Groundwater Agency 2022 Groundwater Sustainability Plan, Yolo County, CA*. January 24.

Future projects would be required to include BMPs to reduce construction- and operation-related impacts to water quality and hydrology in compliance with applicable NPDES permits and local plans and ordinances. Specifically, all projects that disturb one acre or more of soil must comply with the requirements of the Construction General Permit and would be required to comply with the requirements of the Phase II MS4 Permit. The preparation and approval of a SWPPP, erosion and sediment control plans (for construction), and a Post-Construction Standard Plan Worksheet (for operation) would be required for all projects to determine appropriate BMPs to treat potential water quality impacts and control the rate and volume of stormwater runoff. All future projects must consider and address impacts to impaired receiving waters and TMDLs for receiving waters. The TMDL program is a cumulative approach to identifying all constituents that adversely affect the beneficial uses of water bodies and then identifying appropriate reductions in pollutant loads or concentrations from all sources so that the receiving waters can maintain/attain the beneficial uses in the Basin Plan. Thus, by complying with TMDLs, a project's cumulative impacts to overall water quality in the Sacramento Valley Subregion of the Sacramento River Watershed is taken into account. In addition, the preparation and approval of a hydrology study would be required to determine the hydrologic control required to minimize increases in runoff from each site so they do not exceed existing conditions or result in hydromodification impacts. In addition, the city reviews development projects on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available.

Future projects within the boundaries of the Yolo Groundwater Subbasin would also be subject to the Yolo Groundwater Subbasin GSP and the Groundwater Discharge Permit, if groundwater dewatering is required. Additionally, large scale projects would be required to prepare a WSA to determine if adequate water supplies would be available to support additional development during normal, dry year, and multiple dry year demands so as not to contribute to the depletion of water within the groundwater basins. Furthermore, the Phase II MS4 Permit Program requires the incorporation of LID techniques that mimic a project site's natural hydrology by using design measures that capture, filter, store, evaporate, detain, and infiltrate runoff rather than allowing runoff to flow directly to piped or impervious storm drains, thereby offsetting any negative impacts to groundwater quality and groundwater recharge that could result from increasing impervious surfaces.

Regional programs and BMPs, such as TMDL programs and the Phase II MS4 Permit Program, have been designed to address the cumulative effects of proposed development. The proposed project would be required to comply with the requirements of the Construction General Permit, Groundwater Discharge Permit, and Phase II MS4 Permit and implement construction and operational BMPs to reduce pollutants in storm water runoff and address the volume of post project stormwater runoff. Compliance with these regional programs and permits constitutes compliance with programs intended to address cumulative water quality impacts. As stated above, future projects would be required to develop a project-specific SWPPP, erosion and sediment control plans, a Post-Construction Standard Plan Worksheet, and a hydrology study and would be evaluated individually to determine appropriate BMPs and treatment measures to reduce impacts to surface water quality and hydrology. Because the proposed project and other cumulative projects would comply with applicable NPDES requirements and would include BMPs to reduce the volume of storm water runoff and pollutants of concern in storm water runoff, the cumulative hydrology and water

quality impacts of the proposed project and the cumulative projects would be **less than cumulatively considerable**.

4.10.8 Level of Significance Prior to Mitigation

The proposed project would result in potentially significant impacts related to hydrology and water quality.

4.10.9 Regulatory Compliance Measures and Mitigation Measures

4.10.9.1 Regulatory Compliance Measures

The proposed project would comply with the following regulatory compliance measures, the implementation of which is intended to reduce impacts related to hydrology and water quality.

Regulatory Compliance Measure WQ-1

Construction General Permit and Chapter 13.10 of the City of West Sacramento Municipal Code. Prior to commencement of construction activities, the Project Applicant shall obtain coverage under the State Water Resource Control Board's (SWRCB) *National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities*, *NPDES No. CAS000002, Order No. 2022-0057-DWQ* (Construction General Permit), or any other subsequent permit. This shall include submission of Permit Registration Documents (PRDs), including permit application fees, a Notice of Intent (NOI), a risk assessment, a site plan, a Storm Water Pollution Prevention Plan (SWPPP), a signed certification statement, and any other compliance-related documents required by the permit, to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTS). Construction activities shall not commence until a Waste Discharge Identification Number (WDID) is obtained for the project from the SMARTS and provided to the Director of the City of West Sacramento Public Works Department, or designee, to demonstrate that coverage under the Construction General Permit has been obtained and the project is in compliance with Chapter 13.10 of the City of West Sacramento Municipal Code. Project construction shall comply with all applicable requirements specified in the Construction General Permit, including but not limited to, preparation of a SWPPP and implementation of construction site Best Management Practices (BMPs) to address all construction-related activities, equipment, and

materials that have the potential to impact water quality for the appropriate risk level identified for the Project. The SWPPP shall identify the sources of pollutants that may affect the quality of storm water and shall include BMPs (e.g., Sediment Control, Erosion Control, and Good Housekeeping BMPs) to control the pollutants in storm water runoff. Upon completion of construction activities and stabilization of the project site, a Notice of Termination (NOT) shall be submitted via SMARTS.

Regulatory Compliance Measure WQ-2

Groundwater Discharge Permit. At least 45 days prior to dewatering activities, the Construction Contractor shall submit an NOI to the Central Valley Regional Water Quality Control Board (RWQCB) to obtain coverage under the *Central Valley Regional Water Quality Control Board National Pollutant Discharge Elimination System (NPDES) CAG995002 Order R5-2022-0006-02 for WDRs Limited Threat Discharges to Surface Water*. Groundwater dewatering activities shall comply with all applicable provisions in the Groundwater Discharge Permit, including water sampling, analysis, treatment (if required), and reporting of dewatering-related discharges. Upon completion of groundwater dewatering activities, a NOT shall be submitted to the Central Valley RWQCB.

Regulatory Compliance Measure WQ-3

Phase II MS4 Permit, City of West Sacramento Stormwater Management Program (SWMP) Planning Document, and Section 15.14.060 of the City's Municipal Code. Prior to issuance of a grading permit, the Project Applicant shall submit a Final Post-Construction Standard Plan Worksheet to the City of West Sacramento Public Works Director or designee for review and approval. The Final Post-Construction Standard Plan Worksheet shall specify the BMPs to be incorporated into the proposed project design to target pollutants of concern in runoff from the project site. The Final Post-Construction Standard Plan Worksheet shall also incorporate the results of the final hydrology and hydraulic analyses to demonstrate that the detention facilities meet the requirements of the *National Pollutant Discharge Elimination System (NPDES) Permit and WDRs) for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4s), Order*

Water Quality (WQ) No. 2013-00010-WQ, NPDES No. CAS000004, as amended by Order WQ Nos. 2015-0133-EXEC, 2016-0069-EXE, 2017- 0031-DWQ, 2018-0001-EXEC, 2018-0007-EXEC, and 2019-0009-EXEC (Phase II MS4 Permit). The City Public Works Director, or designee, shall ensure that the BMPs specified in the Final Post-Construction Standard Plan Worksheet are incorporated into the final project design.

Regulatory Compliance Measure WQ-4

Chapter 15.50 of the City's Municipal Code. Prior to the issuance of any grading or building permit, the Project Applicant shall demonstrate compliance with Chapter 15.50 of the City's Municipal Code, 200 Year Flood Protection. Compliance with this municipal code requirement shall be demonstrated by completing one of the following:

1. The construction of flood management improvements or other mitigation measures, beyond those set forth in City's Floodplain Management Ordinance (Title 18 of the Municipal Code). The floodplain administrator shall review the design and sufficiency of any such improvements or mitigation measures and may approve, conditionally approve, or disapprove proposed improvements and measures.

2. The payment to the City of an "in-lieu" flood management fee in an amount established by resolution of the city council. In-lieu flood management fees shall be paid at the time of issuance of building permits.

4.10.9.2 Mitigation Measures

The following mitigation measure is required for the proposed project:

Mitigation Measure WQ-1

Back-Up Stormwater Pump. In order to reduce the potential for water quality and localized flooding impact in the event that the proposed stormwater pump fails, the Project Applicant shall design, install, and maintain a backup stormwater pump capable of operating in the event of primary pump failure or power loss. The backup system shall include one or more of the following, as appropriate: a redundant pump of equal capacity, an emergency power supply (e.g., generator or battery backup), or an automatically activated secondary pumping system. The backup

pump shall be designed to provide sufficient capacity to manage peak design storm flows in accordance with applicable local, State, and federal stormwater and flood management standards. Verification of backup pump installation and operational readiness shall be provided to the City of West Sacramento prior to issuance of a certificate of occupancy, and the system shall be maintained by Reclamation District RD No. 900 (RD 900) for the life of the project.

4.10.10 Level of Significance after Mitigation

With implementation of **Regulatory Compliance Measures WQ-1** through **WQ-4** and **Mitigation Measure WQ-1,** all identified potentially significant impacts related to hydrology and water quality resources would be reduced to less than significant except for flooding under Threshold 4.10.3(ii), which would remain **significant and unavoidable.**

4.11 LAND USE AND PLANNING

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for the proposed Brar Farms Residential Development Project (proposed project) to result in impacts in the City of West Sacramento (City) related to land use and planning. This section is based in part on information provided in the City's General Plan, the Southport Framework Plan, and applicable provisions of the City's Sacramento Zoning Code.

4.11.1 Scoping Process

Several comments addressing land use and planning were received during the scoping period. These comments raised concerns about the proposed zoning change, General Plan Amendment (GPA), and the project's potential incompatibility with the Southport Framework Plan as a medium-density residential development.

4.11.2 Methodology

The analysis of potential land use and planning impacts is based on assessing the context of the proposed project (i.e., its geographic location and compatibility with surrounding development) and the proposed project's consistency with relevant land use plans, policies, or regulations contained in applicable planning documents adopted by the city and other agencies for the purpose of avoiding or mitigating an environmental effect that could cause a significant environmental impact. A project's inconsistency with a plan or policy is only considered significant if such inconsistency would result in a significant physical environmental impact, as defined in Section 15382 of the *State CEQA Guidelines*. In other words, a policy or program conflict is not in and of itself considered a significant environmental impact. An inconsistency between the proposed project and an applicable plan is a legal determination that may or may not indicate the likelihood of an environmental impact.

4.11.3 Existing Environmental Setting

4.11.3.1 On-Site Land Uses

The approximately 60-acre project site is located at the corner of Marshall Road and Otis Avenue, within the western portion of the City of West Sacramento in Yolo County. The project site consists of five parcels (Assessor's Parcel Numbers [APNs]: 045-260-008, -009, -010, 045-270-001, and -002).

The project site is undeveloped and relatively flat with a gentle slope toward the southwest. Site elevations along the property range from approximately 8 to 10 feet above mean sea level. Although the project site primarily consists of loose disced soil from previous tilling activities, small patches of vegetation are present mainly along the northern edge of the site that consist of volunteer weeds and annual grasses.

Local vehicular access to the project site is provided by way of Jefferson Boulevard, Marshall Road, and Southport Parkway. Regional vehicular access to the project site is provided by Interstates 5 and 80 (I-5 and I-80), which are located to the east and north of the project site, respectively. The nearest freeway access is primarily via U.S. Route 50, located north of the project site, which provides a direct connection to I-5 for north-south travel. The Harbor Boulevard interchange, approximately three miles north, also provides freeway access.

4.11.3.2 Off-site Land Uses

As shown on **Figure 3-2: Aerial Photograph and Surrounding Land Uses**, in Chapter 3.0, Project Description, the areas surrounding the project site consist of a mix of land uses, including residential and agricultural land uses. The project site is bounded to the north by Marshall Road beyond which lies the Bridgeway Island Village residential development, to the east by Otis Avenue and a mix of residential and agricultural uses, to the south by single-family residential uses, part of the Bridgeway Lakes residential development, and to the west by an existing detention pond that is part of the Bridgeway Lakes Community Park and the Bridgeway Lakes residential development. The existing on-site and adjacent off-site land uses are summarized in **Table 4.11.A: Existing On-Site and Adjacent Off-Site Land Uses and Land Use Designations**, and are shown on **Figure 3-2**.

Table 4.11.A: Existing On-Site and Adjacent Off-Site Land Uses and Land Use Designations

Location	Current Land Use	General Plan Land Use Designation	Zoning
On-site	Undeveloped	Rural Estates	Residential Rural Estates (RE)
North	Single-family residential	Low-Density Residential	Residential One Family (R-1-B)
South	Single-family residential	Low-Density Residential	Residential One Family (R-1-B)
East	Residential and agricultural	Rural Estates	Residential Rural Estates (RE)
West	Bridgeway Lakes Community Park, detention pond, Bridgeway Lakes residential development	Open Space Low-Density Residential	Public Open Space (POS) Residential One Family (R-1-A)

4.11.3.3 General Plan Land Use and Zoning Designations

The project site is currently designated as Rural Estate (RE) in both the City's General Plan and the Southport Framework Plan. The RE land use designation is intended for the development of single-family detached homes, secondary residential units, limited agricultural uses, public and quasi-public uses, and similar and compatible uses in a rural setting. The maximum residential density allowed within the RE designation is one dwelling unit for every 2.5 acres. The project site is currently zoned as Residential Rural Estates (RE). According to the City's Zoning Code, the RE zoning district is intended to provide for residential development on large lots. The RE zoning district allows for development of up to one residential dwelling unit per 2.5 acres, and allows for detached single-family dwelling units, accessory dwelling units, limited agricultural uses, public and quasi-public uses, and other uses that may be appropriate in a rural residential area.

4.11.4 Regulatory Setting

Federal, State, and local regulations and programs related to land use and planning that are applicable to the proposed project are described below.

4.11.4.1 Federal Regulations

There are no federal regulations that apply to the proposed project with respect to land use and planning.

4.11.4.2 State Regulations

California State Planning and Zoning Law. This law, which is codified in California Government Code Sections 65000-66037, delegates most of the State's local land use and development decisions to cities and counties. The California Government Code establishes specific requirements pertaining to the regulation of land uses by local governments, including general plan requirements, specific plans, subdivisions, and zoning. California Government Code Section 65302 requires that all California cities and counties including the following seven elements in their general plan: land use, circulation, housing, conservation, open space, noise, and safety. Cities and counties in the Yolo Solano Air Quality Management District (YSAQMD) must also address air quality in their general plans. Cities and counties that have identified disadvantaged communities must also address environmental justice in their general plans, including air quality.[1]

Sustainable Communities and Climate Protection Act of 2008 (Senate Bill 375). Senate Bill (SB) 375 was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning. This statute requires California's regional planning agencies to include a Sustainable Communities Strategy (SCS) or an Alternative Planning Strategy (APS)[2] in their Regional Transportation Plans (RTP). The SCS provides a plan for meeting the regional emissions reduction targets established by the California Air Resources Board (CARB). SB 375 also offers local governments regulatory and other incentives to encourage more compact new development and transportation alternatives.

The requirements of SB 375 are reflected in the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) adopted by the Sacramento Area Council of Governments (SACOG), which serves as the regional planning agency for the six-county metropolitan region composed of Placer, El Dorado, Sacramento, Sutter, Yolo, and Yuba counties.

4.11.4.3 Regional Regulations

Sacramento Area Council of Governments. Sacramento Area Council of Governments. The Sacramento Area Council of Governments (SACOG) is the federally designated Metropolitan Planning Organization (MPO) for the Sacramento region and prepares the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) in coordination with 22 cities and six counties. The MTP/SCS is a long-range regional plan, with a planning horizon of approximately 20 years, that must be updated every four years in accordance with federal requirements The 2025 Blueprint, adopted on November 20, 2025, is SACOG's current MTP/SCS and serves as the region's comprehensive framework for integrating land use and transportation planning. The plan identifies

[1] Senate Bill 1000, adopted in 2016, requires both cities and counties that have disadvantaged communities to incorporate environmental justice (EJ) policies into their general plans, either in a separate EJ element or by integrating related goals, policies, and objectives throughout the other elements. This update, or revision if the local government already has EJ goals, policies, and objectives, must happen "upon the adoption or next revision of two or more elements concurrently on or after January 1, 2018."

[2] If the emissions reduction targets cannot be met through the Sustainable Communities Strategy, an Alternative Planning Strategy would be prepared that demonstrates how the reduction targets would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies.

transportation investments across all modes, including roadway, transit, bicycle, and pedestrian facilities, and coordinates future growth in housing and employment to support a sustainable, equitable, and economically prosperous region.

The MTP identifies goals and policies related to land in the Sacramento region. The following goals are applicable to the proposed project:

- **Goal 1:** Build vibrant places for today's and tomorrow's residents.

4.11.4.4 Local Regulations

City of West Sacramento General Plan 2035. The following policies and goals are included in the Land Use Element of the General Plan and may be applicable to the proposed project:

- **Goal LU-1:** To provide for sustainable, orderly, well-planned, and balanced growth that meets the needs of residents and businesses, uses land efficiently, and is supported by adequate infrastructure.
    - **Policy LU-1.1:** The City shall encourage compact development patterns and higher development intensities that use land efficiently; preserve open space; support transit, bicycle, and pedestrian mobility; increase housing diversity; and provide for strong neighborhood commercial retail viability.
    - **Policy LU-1.3**: The City shall encourage new large development projects, specific plans, and planned developments to build to a green rating standard and apply for certification in a green neighborhood or development system such as Leadership in Energy and Environmental Design-Neighborhood Development (LEED-ND).
    - **Policy LU-1.4:** The City shall ensure the orderly transition to new uses consistent with the adopted General Plan and phase out existing uses, during the transition period.
    - **Policy LU-1.5:** The City shall actively encourage infill development that is architecturally and environmentally sensitive and is compatible with surrounding land uses.
    - **Policy LU-1.6:** The City shall support infill and refill projects that enhance community character and optimizes City investments in infrastructure.
    - **Policy LU-1.7:** The City shall monitor residential and non-residential development and make adjustments as necessary to the amount of land designated for various uses and the rate of project approvals to promote a reasonable citywide balance between new employment-generating development and housing development.
    - **Policy LU-1.10**: Where a developer proposes a multi-parcel development project with more than one residential density range or maximum FAR, the City shall apply the density or FAR range of the General Plan Land Use Designation to the net developable area of the entire project site rather than individual parcels within the site. Some parcels may be zoned for densities/intensities that exceed the maximum allowed density/intensity of the project

site's Land Use Designation, if the net density of the project as a whole is within the allowed range.

- **Goal LU-3:** To promote the development of complete residential neighborhoods that include a range of residential densities and a variety of housing types, and address the housing needs of various age and socio-economic groups who reside in West Sacramento.
    - **Policy LU-3.4:** The City shall promote the preservation of the integrity of existing stable residential neighborhoods and shall respect existing neighborhood scale and character when infilling and/or upgrading existing residential.
    - **Policy LU-3.6:** The City shall preserve, protect, and enhance established neighborhoods by providing sensitive transitions between these neighborhoods and adjoining areas, and requiring new development, both private and public, to respect and respond to existing design, buildings, streetscapes, and open spaces that contribute to the overall character of the neighborhood.
    - **Policy LU-3.7:** The City shall promote the creation of well-defined residential neighborhoods in newly-developing areas. Each of these neighborhoods should have a clear focal point, such as a neighborhood shopping center, park, school, or other open space and community facility, and should be designed to promote pedestrian convenience. To this end, the City shall encourage the use of existing West Sacramento neighborhoods, including the modified grid street system, as models for the planning and design of new residential neighborhoods.
    - **Policy LU-3.8:** The City shall require the design and development of neighborhoods that are pedestrian-encouraging and include features such as short blocks, broad and well-appointed sidewalks (e.g., lighting, landscaping, adequate width), tree-shaded streets, buildings that define and are oriented to adjacent streets and public spaces, limited driveway curb cuts, paseos and pedestrian lanes, alleys, traffic-calming features, convenient pedestrian street crossings, and access to transit.
    - **Policy LU-3.11:** Land use designations in the Southport area shall be guided by the following principles:
        - Concentrate community commercial, high-density residential and public facilities uses in nodes along major and minor arterials.
        - Allow development of water-dependent recreational commercial uses along the waterways in Southport.
        - Emphasize a mixture of residential types and densities, while concentrating on homeownership as a general goal.
        - Consider the use of Transfer of Development (TDR) provisions to provide for an equitable distribution of the economic returns from future development for all property owners in the Southport area.

- Provide for an orderly sequence of development based on the extension of public facilities and services.

Southport Framework Plan. The Southport area, including the project site, is the focus of the Southport Framework Plan. The Southport Framework Plan refines the policies and land use designations of the City's General Plan. The plan divides Southport into four "villages." The project site is located within the Southwest Village boundary of the Southport Framework Plan.

City of West Sacramento Municipal Code. A zoning code implements a City's General Plan by translating its goals into targeted land use regulations and determination of the types of land uses that are permissible. It is the intent of the city that the General Plan Land Use Element and the Zoning Code be consistent to ensure that long-term goals and objectives are implemented through land use regulations and other tools. The Zoning Code identifies distinct zoning districts and the application of land use and development regulations specific to each district. The City of West Sacramento's Zoning Code is promulgated in Title 17 of the West Sacramento Municipal Code. The City's Zoning Code include land use regulations and development standards, including but not limited to permissible and conditionally permissible land uses, zone-specific height limits, setback requirements, landscape requirements and parking regulations.

City of West Sacramento Subdivision Ordinance. Title 16 of the City's Municipal Code implements and supplements the requirements of the California Subdivision Map Act. It also regulates subdivisions, land divisions, and mergers and ensures that the resulting lots or parcels are adequately served by the necessary utilities, that the required public improvements are made to meet present and anticipated future needs, and that proposed development will not adversely affect the character of the city or its immediate surroundings. The City is responsible for regulation and control of subdivision design and improvement.

4.11.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the proposed project would have a significant adverse impact with respect to land use and planning if it would:

Threshold 4.11.1: Physically divide an established community; or

Threshold 4.11.2: Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

4.11.6 Project Impacts

Potential impacts to land use and planning are discussed below.

Threshold 4.11.1: Would the project physically divide an established community?

Less Than Significant Impact. The physical division of an established community typically refers to the construction of a physical feature (e.g., an interstate highway or railroad tracks) or removal of a

means of access (e.g., a local road or bridge) that would impair mobility within an existing community or between a community and outlying areas. For instance, the construction of an interstate highway through an existing community may constrain travel from one side of the community to another; similarly, such construction may also impair travel to areas outside the community.

The proposed project involves the subdivision of an approximately 60-acre property to create 259 lots for future single-family homes, comprising approximately 34.78 acres of residential development and 15 open space lots totaling 6.65 acres. The open space lots would include a 0.68-acre Central Park, a 0.14-acre parklet at the corner of Marshall Road and Otis Avenue, and 1.81 acres of landscaped lots, including a roundabout, distributed throughout the proposed development to provide greenspace and buffers. Additionally, the open space areas would include a 4.02-acre detention basin, which would also serve as a recreational field during dry seasons. Landscaping, roadway, and utility improvements would be installed within the project site. The proposed project would also construct an internal roadway network with four connections to the existing surrounding roadway network, two roadways opening onto Marshall Road and two roadways opening onto Otis Avenue. Internal sidewalks would be provided along project roadways and would connect residential areas to on-site open space amenities, including Central Park, the parklet, and landscaped areas. These sidewalks would also link to the proposed frontage improvements along Marshall Road and Otis Avenue, which include new sidewalks, thereby providing continuous pedestrian connections between the project site and the surrounding community.

Similarly, the proposed project would connect to already existing utilities, including water, sewer, stormwater, and electrical infrastructure. In addition, several offsite improvements would be included in the proposed project including frontage improvements along the north side of the project site on Marshall Road, consisting of new 5- to 8-foot-wide sidewalks sidewalk, curb, and gutter infrastructure, construction of street lighting, and installation of landscaping. Similar frontage improvements would be constructed along the Otis Avenue frontage. A single-lane roundabout at the intersection of Marshall Road and Otis Avenue adjacent to the northeastern corner of the project site would also be developed. The primary purpose of this facility is to control existing and project-related traffic along Marshall Road and Otis Avenue. Accordingly, the proposed project would not construct any features that would physically divide an established community or remove means of access that would impair mobility in a community. Therefore, the proposed project would have a **less than significant** impact and no mitigation is required.

Threshold 4.11.2: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. Under the California Environmental Quality Act (CEQA), a project's inconsistency with a land use plan or policy is not, in itself, considered a significant environmental impact. Rather, such inconsistency is only considered significant if it would result in a substantial adverse physical change in the environment (*State CEQA Guidelines* Section 15382). Accordingly, this section evaluates the project's consistency with applicable land use plans, policies, and regulations that have been adopted for the purpose of avoiding or mitigating environmental effects. The

analysis includes the SACOG 2025 MTP/SCS, the City of West Sacramento General Plan, the City Zoning Ordinance, and the Southport Framework Plan.

SACOG 2025 Blueprint Metropolitan Transportation Plan/Sustainable Communities Strategy. **Table 4.11.B: MTP/SCS Consistency Analysis** provides a consistency analysis of goals from the 2025 MTP/SCS that are relevant to the proposed project. To eliminate repetitive policies and focus on key issues, goals that are not relevant to the proposed project are not included in **Table 4.11.B**. As described in **Table 4.11.B**, the proposed project would be consistent with applicable goals of the 2025 MTP/SCS, and no mitigation is required.

Table 4.11.B: MTP/SCS Consistency Analysis

Relevant MTP/SCS Goals	Consistency Analysis
MTP/SCS Goal 1: Build vibrant places for today's and tomorrow's residents.	**Consistent**. The proposed project would support potential residents through the buildout of new neighborhoods. The proposed project would subdivide an approximately 60-acre project site into 259 lots for future development of single-family homes, 15 lots for park and open space use, and include landscaping, roadway, and utility improvements. Therefore, the proposed project would be consistent with Goal 1 in the 2025 Blueprint MTP/SCS.

Source: Sacramento Area Council of Governments. 2025 Blueprint Metropolitan Transportation Plan/Sustainable Communities Strategy MTP/SCS).

City of West Sacramento General Plan: The General Plan is a comprehensive plan intended to guide the physical development of the City and it serves as a blueprint for future growth and development. As a blueprint for the future, the plan contains policies and programs designed to provide decision-makers with a solid basis for decisions related to land use and development. As described in Chapter 3.0, Project Description, the proposed project includes a GPA to change the General Plan designation for the project site from Rural Estate (RE) to Low Density Residential (LR) to better align with the project's design, intended land use, and surrounding development patterns. The current land use designation, RE, allows for a maximum of one dwelling unit per 2.5 acres. This residential density is inconsistent with both the surrounding land uses and the proposed project, which includes 259 single-family residential lots and 15 open space lots. In contrast, the LR designation allows up to six dwelling units per acre (DUA), supporting a more efficient use of land while maintaining compatibility with existing adjacent neighborhoods. The Bridgeway Lakes neighborhood, located to the west and south of the project site, and the Bridgeway Island Village neighborhood, located to the north of the project site are both designated LR in the City's General Plan. Upon approval of the GPA, the proposed project would be consistent with the surrounding land use designation, development standards, design guidelines, and goals and objectives contained in the General Plan.

Table 4.11.C: General Plan Consistency Analysis provides a consistency analysis of the goals and policies from the City's General Plan that are relevant to the proposed project. As stated in **Table 4.11.C**, the proposed project's updates to the General Plan would ensure consistency between the project and all applicable General Plan goals and policies.

Table 4.11.C: General Plan Consistency Analysis

Relevant General Plan Goals/Policies	Consistency Analysis
Land Use Element	
Goal LU-1: To provide for sustainable, orderly, well-planned, and balanced growth that meets the needs of residents and businesses, uses land efficiently, and is supported by adequate infrastructure.	**Consistent.** Development of the proposed project would include residential uses for city residents and access to newly proposed open space areas. The proposed project would support buildout of planned development under the Southport Framework Plan. The proposed project includes a GPA and corresponding rezoning to support the planned development of 259 single-family residential lots. Therefore, the proposed project would be consistent with Goal LU-1 of the City's General Plan.
Policy LU-1.1: The City shall encourage compact development patterns and higher development intensities that use land efficiently; preserve open space; support transit, bicycle, and pedestrian mobility; increase housing diversity; and provide for strong neighborhood commercial retail viability.	**Consistent.** The proposed project would subdivide an approximately 60-acre project site into 259 lots for future development of single-family homes, 15 lots for open space and park use, and associated landscaping, roadway, and utility improvements. Included in the proposed project is a GPA to change the project site land use from Rural Estate (RE) to Low Density Residential (LR) to better align with the project's design, intended land use, and surrounding development patterns. Currently, the project site is designated as RE in both the City's General Plan and the Southport Framework Plan. The RE land use designation is intended for the development of single-family detached homes, secondary residential units, limited agricultural uses, public and quasi-public uses, and similar and compatible uses in a rural setting. The maximum residential density allowed within the RE designation is one dwelling unit for every 2.5 acres. In addition, the project site is also currently zoned as RE. According to the City's Zoning Code, the RE zoning district is intended to provide for residential development on large lots and provide a transition between agricultural lands and residential designated lands. Upon development of the proposed project, a GPA to the City's existing General Plan and an amendment to the Southport Framework Plan to change the designations from Rural RE to Low-Density Residential (LR) would be required. In addition, a Zoning Map/Code amendment to rezone the site from RE to Residential One Family (R-1-A) would also be required to provide for single-family detached and attached homes and allow a maximum residential density of 6.0 dwelling units per acre (DUA). Accordingly, these amendments would allow the project to be consistent with the City's Zoning Code and planning documents governing the project site. Therefore, the proposed project would be consistent with Policy LU-1.1 of the City's General Plan.
Policy LU-1.3: The City shall encourage new large development projects, specific plans, and planned developments to build to a green rating standard and apply for certification in a green neighborhood or development system such as Leadership in Energy and Environmental Design-Neighborhood Development.	**Consistent.** The proposed project would be designed to comply with the water efficiency and energy conservation requirements included in the CBC Standards Code California Code of Regulations (CCR) Title 24. The proposed residential units would also feature passive use solar heating and cooling, natural ventilation, energy-efficient windows (such as Low E Vinyl, Argon Glass Filled Low E, or Low E Wood Frame), solar roofs, green roofs, or cool roof systems, and energy-efficient home appliances.

Table 4.11.C: General Plan Consistency Analysis

Relevant General Plan Goals/Policies	Consistency Analysis
Policy LU-1.4: The City shall ensure the orderly transition to new uses consistent with the adopted General Plan and phase out existing uses, during the transition period.	**Consistent.** The project site is undeveloped and therefore the proposed land use changes would not displace existing uses and would facilitate an orderly transition. Additionally, the project anticipates approval of a Development Agreement with the City that would govern project phasing, infrastructure obligations, and land use implementation. This agreement would ensure that future development of the site proceeds in an orderly manner. Therefore, the proposed project would be consistent with Policy LU-1.4 of the City's General Plan.
Policy LU-1.5: The City shall actively encourage infill development that is architecturally and environmentally sensitive and is compatible with surrounding land uses.	**Consistent.** The proposed project would subdivide an approximately 60-acre project site into 259 lots for future development of single-family homes, 15 lots for open space and park use, and associated landscaping, roadway, and utility improvements. The proposed project is adjacent to residential neighborhoods to the north and south, and is in a developed area served by public infrastructure. The proposed project would be architecturally designed to match the surrounding residential neighborhoods, and would include landscaping and open space areas. As such, the proposed project would represent architecturally and environmentally sensitive infill development that is compatible with surrounding land uses. Therefore, the proposed project would be consistent with Policy LU-1.5.
Policy LU-1.6: The City shall support infill and refill projects that enhance community character and optimizes City investments in infrastructure.	**Consistent.** The proposed project is an infill development located within an established urban area served by existing public infrastructure. The project would enhance community character through compatible architectural design with neighboring residential developments and incorporation of open space and landscaping. Additionally, the proposed project would develop local streets to facilitate circulation throughout the proposed residential development, all of which will be public and meet applicable City Standards. The proposed streets would accommodate 5- to 8-foot-wide sidewalks, landscape strips in-between the curb and sidewalk and Class III bikeways within the proposed development, Class II bikeways along Marshall Road and Otis Avenue, and enhanced crosswalks with speed tables and bulb outs. A single-lane roundabout at the intersection of Marshall Road and Otis Avenue adjacent to the northeastern corner of the project site would also be developed. The primary purpose of this facility is to control existing and project-related traffic along Marshall Road and Otis Avenue. By utilizing and improving the existing roadway circulation, the project would optimize prior City investments. Therefore, the proposed project would be consistent with Policy LU-1.6.
Policy LU-1.7: The City shall monitor residential and non-residential development and make adjustments as necessary to the amount of land designated for various uses and the rate of project approvals to promote a reasonable citywide balance between new employment-generating development and housing development.	**Consistent.** The proposed project would subdivide the approximately 60-acre site into 259 residential lots, 15 open space and park lots, and associated infrastructure improvements. The site is currently vacant and would be developed with residential uses consistent with its proposed General Plan land use designation and zoning. The project would not convert or reduce land designated for employment-generating purposes and would contribute to the City's housing supply to support existing and future employment within the community. Therefore, the project would not interfere

Table 4.11.C: General Plan Consistency Analysis

Relevant General Plan Goals/Policies	Consistency Analysis
	with the City's ability to maintain a jobs–housing balance and would be consistent with Policy LU-1.7.
Goal LU-3: To promote the development of complete residential neighborhoods that include a range of residential densities and a variety of housing types, and address the housing needs of various age and socio-economic groups who reside in West Sacramento.	**Consistent.** The proposed project would subdivide an approximately 60-acre project site into 259 lots for future development of single-family homes, 15 lots for open space and park use, and associated landscaping, roadway, and utility improvements. The proposed project would support the development of complete residential neighborhoods by providing the future development of a complete residential neighborhood. Additionally, as discussed in Section 4.14, Population and Housing, West Sacramento is projected to experience population, household, and employment growth. According to Sacramento Area Council of Governments (SACOG) and City projections, the City's population is expected to increase by approximately 65 percent between 2016 and 2040, while the number of households is projected to increase by approximately 83 percent over the same period. Employment in West Sacramento is also anticipated to grow by approximately 50 percent. This projected growth indicates an increasing demand for new residential development to accommodate future residents and employees within the City. Furthermore, according to the 2023 American Community Survey, approximately six percent of the City's population is under the age of five, 25 percent of the City's population is under the age of 18, approximately 30 percent is between the ages of 25 and 44, and 11 percent of the City's population is over the age of 65. Given these age characteristics, the City includes a range of age groups, including children, working-age adults, and older adults. The proposed project would help meet the City's housing needs by providing single-family residential development within a planned neighborhood that includes open space and park areas of age. Accordingly, the proposed project would be consistent with Goal LU-3 of the City's General Plan.
Policy LU-3.4: The City shall promote the preservation of the integrity of existing stable residential neighborhoods and shall respect existing neighborhood scale and character when infilling and/or upgrading existing residential.	**Consistent.** All new residential development under the proposed project would occur in areas already designated for residential development. This residential development would be consistent with surrounding land uses which consist of other single-family homes. The proposed project would be denser than the rural neighborhood to the east. However, similar in scale and character to the existing residential neighborhoods to the north, south, and west. Therefore, the proposed project would be consistent with Policy LU-3.4 of the City's General Plan.
Policy LU-3.5. The City shall protect existing residential neighborhoods from the encroachment of incompatible activities and land uses (e.g., traffic, noise) and environmental hazards (e.g., flood).	**Consistent.** The proposed project would subdivide an approximately 60-acre project site for future development of single-family homes, open space and park areas, and associated roadway and pedestrian improvements. This development would be compatible with the residential uses in surrounding areas. The existing residential neighborhoods to the north and south of the proposed project are zoned R-1-B and designated LR in the City's General Plan, allowing a maximum residential density of 6.0 units per gross acre. The proposed project would be consistent with the

Table 4.11.C: General Plan Consistency Analysis

Relevant General Plan Goals/Policies	Consistency Analysis
	residential densities of these surrounding residential neighborhoods. Therefore, the proposed project would not introduce incompatible uses to the neighborhood. This EIR has also analyzed the proposed project's impact on traffic, noise, and environmental hazards in the respective topical sections (Section 4.9, Hazards & Hazardous Materials, Section 4.13, Noise, and Section 4.17, Transportation). As discussed in these sections, the project would not result in significant impacts related to incompatible activities or environmental hazards. Therefore, the proposed project would be consistent with Policy LU-3.5 of the City's General Plan.
Policy LU-3.6: The City shall preserve, protect, and enhance established neighborhoods by providing sensitive transitions between these neighborhoods and adjoining areas, and requiring new development, both private and public, to respect and respond to existing design, buildings, streetscapes, and open spaces that contribute to the overall character of the neighborhood.	**Consistent.** The proposed project would subdivide an approximately 60-acre project site into 259 lots for future development of single-family homes. The proposed project would also include roadway improvements that would enhance circulation between the proposed development and neighboring communities. Therefore, the proposed project would be consistent with Policy LU-3.6 of the City's General Plan.
Policy LU-3.7: The City shall promote the creation of well-defined residential neighborhoods in newly-developing areas. Each of these neighborhoods should have a clear focal point, such as a neighborhood shopping center, park, school, or other open space and community facility, and should be designed to promote pedestrian convenience. To this end, the City shall encourage the use of existing West Sacramento neighborhoods, including the modified grid street system, as models for the planning and design of new residential neighborhoods.	**Consistent.** The proposed project includes development of 15 open space lots totaling 6.65 acres and consisting of park uses, including a Central Park, parklet, landscape lots, and the community recreation basin. The parklet is proposed at the corner of Marshall Road and Otis Avenue, with entry monumentation signage to serve as a clear focal point of the community. The proposed parklet would be adjacent to the roundabout, which would be developed at the northeastern corner of Marshall Road and Otis Aveune. Additionally, the proposed project would include development of internal roadways and pedestrian improvements. Therefore, the proposed project would be consistent with Policy LU-3.7 of the City's General Plan.
Policy LU-3.8: The City shall require the design and development of neighborhoods that are pedestrian-encouraging and include features such as short blocks, broad and well-appointed sidewalks (e.g., lighting, landscaping, adequate width), tree-shaded streets, buildings that define and are oriented to adjacent streets and public spaces, limited driveway curb cuts, paseos and pedestrian lanes, alleys, traffic-calming features, convenient pedestrian street crossings, and access to transit.	**Consistent.** The proposed project includes development of internal roadways and pedestrian improvements. These features would connect to the roadway and sidewalks on Marshall Road and Otis Avenue and support pedestrian access to neighboring communities and open space areas. The proposed streets would have approximately 50 to 60 feet of cross-section right-of-way, and would accommodate 5- to 8-foot-wide sidewalks, landscape strips in-between the curb and sidewalk and Class III bikeways within the proposed development. Improvements adjacent to the project site would include Class II bikeways along Marshall Road and Otis Avenue, and enhanced crosswalks with speed tables and bulb outs. A single-lane roundabout at the intersection of Marshall Road and Otis Avenue adjacent to the northeastern corner of the project site would also be developed. The primary purpose of this facility is to control existing and project related traffic along Marshall Road and Otis Avenue. Additionally, lighted bollards would be installed to provide illumination at the pedestrian scale and would be located throughout the parklet and the Central Park. Therefore, the

Table 4.11.C: General Plan Consistency Analysis

Relevant General Plan Goals/Policies	Consistency Analysis
	proposed project would be consistent with Policy LU-3.8 of the City's General Plan.
Policy LU-3.11: Land use designations in the Southport area shall be guided by the following principles: ● Concentrate community commercial, high-density residential and public facilities uses in nodes along major and minor arterials. ● Allow development of water-dependent recreational commercial uses along the waterways in Southport. ● Emphasize a mixture of residential types and densities, while concentrating on homeownership as a general goal. ● Consider the use of Transfer of Development (TDR) provisions to provide for an equitable distribution of the economic returns from future development for all property owners in the Southport area. ● Provide for an orderly sequence of development based on the extension of public facilities and services.	**Consistent.** The proposed project site is within the Southport Area and would be developed consistent with the urban development pattern envisioned by the Southport Framework Plan. The proposed GPA would change the existing Rural Estate (RE) designation, which allows one dwelling unit per 2.5 acres, to Low Density Residential (LR), which allows up to 6.0 dwelling units per acre. This change would establish a residential density compatible with surrounding neighborhoods to the north, south, and west, which are similarly designated LR and developed with single-family homes. The proposed project would contribute 259 single family residences to the project site which would concentrate on homeownership within Southport area. Additionally, the 6.65 acres of open space consisting of the Central Park, parklet, landscape lots, and the detention basin would be consistent with the Framework Plan's intent to create cohesive, connected residential communities within Southport. Therefore, the proposed project would be consistent with Goal LU-3.11 of the City's General Plan.
Urban Structure and Design Element	
Goal UD-1. To promote development and urban design that creates neighborhoods, districts, centers, and corridors that are unique and contribute positively to the overall urban structure and character of West Sacramento.	**Consistent.** The proposed project would subdivide an approximately 60-acre project site for future development of single-family homes, open space and park areas, and associated roadway and pedestrian improvements. The proposed project would contribute to the developing neighborhood design in the Southport area. The proposed project would develop an undeveloped project site and positively contribute to the City's urban structure. Therefore, the proposed project would be consistent with Goal UD-1 of the City's General Plan.
Policy UD-1.1. The City shall ensure that development and redevelopment projects and plans, and urban design plans and guidelines for neighborhoods, districts, and corridors reflect the citywide urban structure and design concepts set out in the General Plan.	**Consistent.** The proposed project would be designed to be consistent with the guidelines established for planned development in the Southport Villages. Southport Village would integrate a variety of residential uses and/or neighborhood commercial services into existing and planned neighborhoods. The proposed project would require Design Review Approval of the Brar Farms Design Guidelines by the City. These guidelines build upon and update the existing Southport Design Guidelines, enhancing their architectural intent. Therefore, the proposed project would be consistent with Policy UD-1.1 of the City's General Plan.
Policy UD-1.2. The City shall ensure that transitions between urban and rural areas at the edge of the community do not diminish the visual quality of open space.	**Consistent.** The proposed project is in a partially developed area of Southport surrounded by residential communities. The proposed project would be designed to include entry monuments and signage to serve as a clear focal point of the community and to smooth the transition between the residential development and adjacent agricultural areas. Therefore, the proposed project would be consistent with Policy UD-1.2 of the City's General Plan.

Table 4.11.C: General Plan Consistency Analysis

Relevant General Plan Goals/Policies	Consistency Analysis
Policy UD-1.7. The City shall promote the design of complete and well-structured neighborhoods that respect and respond to the physical characteristics, buildings, streetscapes, open spaces, and urban forms that contribute to their overall character and livability.	**Consistent.** The proposed project includes the development of a complete residential community, including open space and park areas, internal roadways and pedestrian improvements. Therefore, the proposed project would be consistent with Policy UD-1.7 of the City's General Plan.
Policy UD-1.9. The City shall protect well-defined existing street patterns and require new development and redevelopment projects to create walkable, pedestrian-scaled blocks, publicly- accessible mid-block and alley pedestrian routes where appropriate, and appropriately scaled sidewalks.	**Consistent.** The proposed project would construct several public streets up to 60 feet wide to facilitate circulation throughout the proposed residential development. The proposed project would accommodate 5- to 8-foot-wide sidewalks, landscape strips in-between the curb and sidewalks, and Class III bikeways within the proposed development. Therefore, the proposed project would be consistent with Policy UD-1.9 of the City's General Plan.
Policy UD-1.13. The City shall require design review that focuses on achieving appropriate form and function for new development and redevelopment to promote creativity, innovation, safety and quality design.	**Consistent.** The proposed project would be required to obtain Design Review Approval from the City. Therefore, the proposed project would be consistent with Policy UD-1.13 of the City's General Plan.
Mobility Element	
Goal M-4. To support and maintain a range of public and private transit systems that are responsive to the needs of all residents and employees and allow efficient and safe travel throughout the city and region.	**Consistent.** The proposed project is located in an urban area supported by the Yolo County Transportation District. Bus stops are provided in the project vicinity for future residents and employees along Marshall Road. Therefore, the proposed project is consistent with Goal M-4 of the City's General Plan.
Policy M-4.1 The City shall strive to ensure that all residents have access to adequate and safe public transit options that offer alternative travel choices to private vehicle use, reduce dependence on fossil fuels, and increase physical activity.	**Consistent.** Future residents of the proposed project would have access to bus stops along Marshall Road. Bus Route 37 operates hourly on weekdays only, connecting the Southport area of West Sacramento to Downtown Sacramento. The proposed project would develop new sidewalks, and Class II and III bikeways. Therefore, the proposed project would provide alternative travel choices to private vehicle use. The proposed project would be consistent with Policy M-4.1 of the City's General Plan.
Goal M-5. To develop and maintain a safe, comprehensive, and integrated bicycle system and bicycle support facilities throughout the city.	**Consistent.** The proposed project would develop Class III bikeways within the proposed development, and Class II bikeways along the project site on Marshall Road and Otis Avenue, contributing to the City's bicycle system. Therefore, the proposed project would be consistent with Goal M-5 of the City's General Plan.
Policy M-5.1. The City shall maintain and implement a Bicycle, Pedestrian, and Trails Master Plan that identifies priority improvements. New development shall be required to be consistent with the applicable portions of the Plan.	**Consistent.** The proposed project would develop Class II bikeways along the project site on Marshall Road and Otis Avenue, consistent with the improvements planned in the City's Bicycle, Pedestrian, and Trails Master Plan. Therefore, the proposed project would be consistent with Policy M-5.1 of the City's General Plan.
Policy M-5.2. The City shall maintain and improve a safe and convenient network of identified bicycle routes connecting residential areas with recreation, parks, scenic areas, the riverfront, schools, the Central Business District, public facilities, shopping, and employment areas.	**Consistent.** The City's Bicycle, Pedestrian, and Trails Master Plan identifies Marshall Road as having an existing Class II bikeway. The proposed project would improve the Class II bikeway along the project site on Marshall Road and Otis Avenue to connect the proposed residential development to other portions of the City. Therefore, the proposed project would be consistent with Policy M-5.2 of the City's General Plan.

Table 4.11.C: General Plan Consistency Analysis

Relevant General Plan Goals/Policies	Consistency Analysis
Policy M-5.4. The City shall ensure that new commercial and residential development projects provide frequent and direct connections to existing and planned bicycle facilities.	**Consistent.** The proposed Class III bikeways proposed for development on the project site would connect to the existing Class II bikeways along Marshall Road and Southport Parkway. Therefore, the proposed project would be consistent with Policy M-5.4 of the City's General Plan.
Policy M-5.5. The City shall maintain, to the maximum extent possible, an appropriate system of low-stress bikeways that encourage cyclists of all skill levels that includes Class I, II, III, IV facilities, and should plan for and install the most protected facility feasible in areas where relatively high bicycle activity is anticipated.	**Consistent.** The proposed project would add Class II and Class III facilities to the existing bicycle network. Therefore, the proposed project would be consistent with Policy M-5.5 of the City's General Plan.
Policy M-5.7. The City shall consider bicycle safety when implementing improvements for vehicle traffic operations, including setting speed limits and implementing complete street improvement projects.	**Consistent.** The proposed project includes enhanced crosswalks with speed tables and bulb outs that would support bicycle safety. Therefore, the proposed project would be consistent with Policy M-5.7 of the City's General Plan.
Goal M-6. Develop and maintain a safe, accessible, and integrated pedestrian system that promotes walking.	**Consistent.** The proposed project includes development of new internal streets, sidewalks, and rights-of-way to support the proposed residential development. Therefore, the proposed project would be consistent with Goal M-6 of the City's General Plan.
Policy M-6.5. The City shall require new subdivisions and large-scale developments to include safe pedestrian walkways that provide direct links between streets and major destinations such as transit stops and stations, residential areas, schools, parks, retail, and services.	**Consistent.** The proposed project includes the development of sidewalks throughout the proposed internal streets and Marshall Road. Improvements along Marshall Road would provide linkages to transit stops east of Marshall Road and Otis Avenue. Therefore, the proposed project would be consistent with Policy M-6.5 of the City's General Plan.
Goal M-7. To develop and manage both on- and off-street parking systems that balance citywide goals of economic development, livable neighborhoods, and public safety.	**Consistent.** The proposed project would include the development of single-family homes with two-car garages and driveways for parking cars. On-street parking would also be available for residents and guests. Therefore, the proposed project would be consistent with Goal M-7 of the City's General Plan.
Policy M-7.4. The City shall require provision of adequate off-street parking, as needed, for new developments. The adequacy and appropriateness of parking requirements in the Zoning Code shall be periodically reevaluated.	**Consistent.** The proposed project would provide adequate off-street parking for each future single-family home through two-car garages and driveway parking. Therefore, the proposed project would be consistent with Policy M-7.4 of the City's General Plan.
Public Facilities and Services Element	
Goal PFS-1. To ensure the provision of adequate and efficient facilities and services that maintain service levels are adequately funded, and strategically allocated.	**Consistent.** Refer to Section 4.15, Public Services, for a detailed discussion of the proposed project's potential impacts on public facilities. The proposed project would be adequately served by City public facilities. Therefore, the proposed project would be consistent with Goal PFS-1 of the City's General Plan.
Policy PFS-1.2. The City shall require that new development pay its fair share of the cost of providing new public facilities and services and/or the costs of expanding/upgrading existing facilities and services impacted by new development.	**Consistent.** Pursuant to the City's Municipal Code, the Project Applicant would pay applicable development fees. Therefore, the proposed project would be consistent with Policy PFS-1.2 of the City's General Plan.

Table 4.11.C: General Plan Consistency Analysis

Relevant General Plan Goals/Policies	Consistency Analysis
Goal PFS-2. To maintain an adequate level of service in the City's water system to meet the needs of existing and future development while improving water system efficiency.	**Consistent.** Refer to Section 4.19, Utilities and Service Systems, for a detailed discussion of the proposed project's potential impacts on the City's water system. According to the Water Supply Assessment prepared for the proposed project, the City would maintain an adequate level of service in the City's water service system to meet the needs of the existing and future development. Therefore, the proposed project would be consistent with Goal PFS-2 of the City's General Plan.
Policy PFS-2.2. The City shall continue to expand and develop water treatment, distribution, and storage facilities to accommodate the needs of existing and planned development.	**Consistent.** According to the Water Supply Assessment prepared for the proposed project, the City would have adequate infrastructure to meet the needs of the existing development and the proposed project. Additionally, an updated assessment of the project's impacts on the City's existing water infrastructure was completed in October 2025 to identify what improvements would be needed to serve the project. The updated assessment confirmed that the addition of project demand would not cause system pressures to fall below City standards or pipeline velocities to exceed allowable thresholds. Therefore, the proposed project would be consistent with Policy PFS-2.2 of the City's General Plan.
Policy PFS-2.3. To minimize the need for the development of new water sources and facilities and to minimize sewer flows, the City shall promote water conservation both in City operations and in private development, including water recycling.	**Consistent.** The proposed project would be designed to comply with the water efficiency requirements included in the CCR Title 24. Therefore, the proposed project would be consistent with Policy PFS-2.3 of the City's General Plan.
Policy PFS-2.7. The City shall maintain fire hydrants and ensure the provision of adequate fire-flow rates in all new development.	**Consistent.** The proposed project includes improvements such as water valves, water mains, and fire hydrants within the project site. Therefore, the proposed project would be consistent with Policy PFS-2.7 of the City's General Plan.
Policy PFS-2.8. The City shall, through a combination of water development fees and other funding mechanisms, ensure that new development pays its fair share of the costs of water system improvements.	**Consistent.** The Project Applicant would pay applicable water development fees and/or other funding mechanisms to pay its fair share of water system improvements. Therefore, the proposed project would be consistent with Policy PFS-2.8 of the City's General Plan.
Goal PFS-3. To maintain an adequate level of service in the City's wastewater collection and conveyance system to meet the needs of existing and future development.	**Consistent.** The City would have adequate capacity to serve the needs of the proposed project and existing development in the City. Therefore, the proposed project would be consistent with Goal PFS-3 of the City's General Plan.
Policy PFS-3.3. The City shall ensure the provision of adequate wastewater service to all new development and support the extension of wastewater service to existing developed areas where this service is lacking.	**Consistent.** Refer to Section 4.19, Utilities and Service Systems, for a detailed discussion of the proposed project's potential impacts on the City's wastewater system. According to the Sewer Capacity Study prepared for the proposed project, the City would have adequate infrastructure to meet the needs of the existing development and the proposed project. Therefore, the proposed project would be consistent with Policy PFS-3.3 of the City's General Plan.
Policy PFS-3.5. The City shall, through a combination of wastewater development fees and other funding mechanisms, ensure that new development pays its fair share of the costs of wastewater system improvements.	**Consistent.** The Project Applicant would pay applicable wastewater development fees and/or other funding mechanisms to pay its fair share of wastewater system improvements. Therefore, the proposed project would be consistent with Policy PFS-3.5 of the City's General Plan.

Table 4.11.C: General Plan Consistency Analysis

Relevant General Plan Goals/Policies	Consistency Analysis
Goal PFS-4. To maintain an adequate level of service in the City's storm drainage system to accommodate runoff from existing and future development, prevent property damage due to flooding, and improve environmental quality.	**Consistent.** The project site would be developed with storm drainage improvements, which would include the installation of new curbs and gutters, curb inlets and catch basins, and storm drain manholes throughout the project site, and Low Impact Development (LID) Best Management Practices (BMPs), including a 4.02-acre detention basin located at the center of the site and a pump station to regulate stormwater flows. The proposed project would incorporate the LID design requirements, in total providing a runoff capture capacity of 25.6 acre-feet, significantly exceeding the minimum required capacity of 2.1 acre-feet for flow treatment. Therefore, the proposed project would be consistent with Goal PFS-4 of the City's General Plan.
Policy PFS-4.2. The City shall continue to expand and develop stormwater drainage facilities to accommodate the needs of existing and planned development.	**Consistent.** The proposed project would develop storm drainage improvements to support the proposed residential development. Therefore, the proposed project would be consistent with Policy PFS-4.2 of the City's General Plan.
Policy PFS-4.4. The City shall, through a combination of drainage improvement fees and other funding mechanisms, ensure that new development pays its fair share of the costs of drainage system improvements.	**Consistent.** The Project Applicant would pay applicable drainage improvement fees and/or other funding mechanisms to pay its fair share of drainage system improvements. Therefore, the proposed project would be consistent with Policy PFS-4.4 of the City's General Plan.
Policy PFS-4.6. The City shall require new stormwater drainage facilities to be designed to enhance recreation and habitat and be integrated into existing parks and open space features.	**Consistent.** The proposed project includes a 4.02-acre detention basin which would serve as a recreational field during dry seasons. Therefore, the proposed project would be consistent with Policy PFS-4.6 of the City's General Plan.
Policy PSF-4.20. The City shall require new development to be designed to prevent the diversion of floodwaters onto neighboring parcels.	**Consistent.** The proposed project would comply with the Phase II MS4 Permit to ensure the residential development would not result in on- or off-site flooding. Therefore, the proposed project would be consistent with Policy PFS-4.20 of the City's General Plan.
Goal PFS-5. To minimize the generation of waste, increase recycling, and provide for the collection and disposal of solid waste.	**Consistent.** The proposed project would participate in citywide recycling programs and receive trash collection service through the City's contract with Waste Management. Therefore, the proposed project would be consistent with Goal PFS-5 of the City's General Plan.
Policy PFS-5.8. The City shall require major new development, demolition, and rehabilitation projects to recycle or salvage 70 percent of non-hazardous construction and demolition debris (excluding excavated soil and land-clearing debris).	**Consistent.** The proposed project does not require demolition. Any construction debris would be recycled or salvaged according to City and CALGreen Code requirements. Therefore, the proposed project would be consistent with Policy PFS-5.8 of the City's General Plan.
Policy PFS-5.12. The City shall encourage residents and businesses to reduce yard waste through methods such as backyard composting, grass recycling, and using resource efficient landscaping techniques.	**Consistent.** As discussed in Section, 4.19 Utilities and Service Systems, Construction and operation of the proposed project would comply with applicable federal, State, and local statutes and regulations related to solid waste, including Assembly Bill (AB) 75 (solid waste diversion), AB 1826 (organic waste recycling), and Senate Bill (SB) 1383 (organic waste collection services), and SB 1016 (disposal-based reporting). The project would implement solid waste diversion requirements during operation in accordance with AB 75, such as providing adequate on-site refuse, recycling, and organic waste containers; requiring source separation of

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	recyclable and organic materials; and participating in the City's solid waste, recycling, and organics collection programs in accordance with Chapter 8.08 (Solid Waste) of the City's Municipal Code.[3] In addition, required participation in the citywide recycling programs, would support the City's compliance with SB 1016's disposal-based reporting requirements, thereby reducing demand for landfill space. During operation, the project would be required to provide adequate on-site refuse, recycling, and organic waste collection infrastructure consistent with City standards, supporting residential recycling and organics collection in accordance with Policy PFS-5.9 of the City of West Sacramento General Plan. Therefore, the proposed project would be consistent with Policy PFS-5.12 of the City's General Plan.
Policy PFS-7.5. The City shall coordinate with the Washington Unified School District during the development review process for new residential development that could impact school facilities and services.	**Consistent.** Pursuant to the provisions of Government Code Section 65996, a project's impact on school facilities is fully mitigated through payment of the requisite school facility development fees current at the time a building permit is issued. The proposed project would pay its applicable School Impact Fee to mitigate impacts to school facilities and services. Therefore, the proposed project would be consistent with Policy PFS-7.6 of the City's General Plan.
Policy PFS-7.6. The City shall cooperate with the Washington Unified School District in an effort to ensure adequate financing for new school facilities, by assisting in the collection of school facility development fees from new residential and non-residential development.	**Consistent.** The Project Applicant would pay the most current School Impact Fee for residential development. Therefore, the proposed project would be consistent with Policy PFS-7.6 of the City's General Plan.
Goal PFS-8. To maintain an adequate level of police service as new development occurs to protect residents, visitors, and property.	The proposed project would generate 725 new residents which would increase the demand for police protection. According to the draft Fiscal Impact Analysis completed for the proposed project,[4] it was determined that the project would require additional police personnel; however, the draft Fiscal Impact Analysis concluded that project generated tax revenue would be adequate to fully offset these police service costs. Pursuant to Chapter 12.40 (Police Facilities Development Fees) of the City's Municipal Code, the proposed project would be required to implement **Regulatory Compliance Measure PS-2**, which would require that the Project Applicant(s) pay a development fee to the City of West Sacramento. The development fee paid would increase capital funding to mitigate impacts of new development on the level of service capacity in existing facilities. Therefore, the proposed project would be consistent with Goal PFS-8 of the City's General Plan.

[3] City of West Sacramento.2025. West Sacramento Municipal Code. *Chapter 8.08, Solid Waste*. Website: https://ecode360.com/43200771#43200771 (accessed February 2026).

[4] City of West Sacramento. 2026. *Draft Brar Farms Fiscal Impact Analysis*. June 30.

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Goal PFS-9. To prevent loss of life, injury, and property damage due to wildland and structural fires, while ensuring an adequate level of fire protection service is maintained for all.	**Consistent.** The proposed project is not located within or near a Very High Fire Hazard Severity Zone. The proposed residential development would be designed according to building and fire codes. Therefore, the proposed project would be consistent with Goal PFS-9 of the City's General Plan.
Policy PFS-9.1. The City shall provide new and expanded fire department facilities to adequately serve the needs of existing and future development.	**Consistent**. The proposed project would increase the demand for fire protection services and would, therefore, be required to participate in the City's planned Fire Services Community Facilities District (CFD), which will provide a dedicated revenue source for ongoing fire operations, including staffing and equipment needed to serve new growth. Therefore, the proposed project would be consistent with Policy PFS-9.1 of the City's General Plan.
Policy PFS-9.4. The City shall ensure that adequate water fire-flow capability is provided throughout the city and shall regularly monitor fire-flow to ensure adequacy. New residential and nonresidential development shall conform to fire flow requirements of the CFC.	**Consistent.** According to the Water Supply Assessment prepared for the proposed project, the City would have adequate water fire-flow capacity to support the proposed project. The proposed residential development would be designed according to applicable building and fire codes. Therefore, the proposed project would be consistent with Policy PFS-9.4 of the City's General Plan.
Policy PFS-9.8. The City shall include Fire Department staff in the review of all new development projects to ensure compliance with State and other adopted fire safety and structural stability standards.	**Consistent.** The West Sacramento Fire Department (WSFD) would review and comment on the site plan prior to approval to ensure compliance with adopted fire safety and structural stability standards. Therefore, the proposed project would be consistent with Policy PFS-9.8 of the City's General Plan.
Policy PFS-9.10. The City shall require that new development provides all necessary water service, fire hydrants, and roads consistent with Fire Department standards.	**Consistent.** The proposed project includes development of single-family homes, internal streets, and sidewalk. Fire hydrants are proposed within the project site. Internal streets would be developed consistent with Fire Department standards to ensure safe and efficient emergency vehicle access. Therefore, the proposed project would be consistent with Policy PFS-9.10 of the City's General Plan.
Policy PFS-9.11. The City shall ensure that fire equipment access is integrated into the design of new developments, as well as the use of fire-resistant landscaping and building materials.	**Consistent.** The proposed streets would be designed to allow fire truck access. The proposed residential development would be designed according to applicable building and fire codes. Therefore, the proposed project would be consistent with Policy PFS-9.11 of the City's General Plan.
Parks and Recreation Element	
Goal PR-1. To establish and maintain a public park system and recreation facilities suited to the needs of West Sacramento residents and visitors.	**Consistent.** The proposed project involves the subdivision of an approximately 60-acre property to create 259 lots for future single-family homes, comprising approximately 34.78 acres of residential development and 15 open space lots totaling 6.65 acres. The open space lots would include a 0.68-acre Central Park, a 0.14-acre parklet at the corner of Marshall Road and Otis Avenue, and 1.81 acres of landscaped lots, including a roundabout, distributed throughout the proposed development to provide greenspace and buffers. Additionally, the open space areas would include a 4.02-acre detention basin, which would also serve as a recreational field during dry seasons. The 6.65 acres of recreational and open space areas within the proposed project, including the recreational elements of the detention basin, park, and landscaped lots would be privately owned and maintained by a future Homeowners Association (HOA). RD 900 would maintain the stormwater and

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	drainage components of the detention basin and said maintenance would be funded by the RD 900 property assessments and to RD900's standards Although these park improvements would not be part of the City's park system, they would be publicly accessible to residents within the City. Therefore, the proposed project would be consistent with Goal PR-1 of the City's General Plan.
Policy PR-1.2. The City shall require new residential development to help meet the City's park acreage standard as shown in Table PR-1 and established in the adopted Parkland Dedication Ordinance. To this end, the City shall require of all new development the dedication of land, dedication of improvements, payment of in-lieu fees, or any combination of these determined acceptable by the City, to the extent authorized by law. Projects located in an areas subject to a specific plan may employ alternative strategies to achieve recreation goals.	**Consistent.** The proposed project includes approximately 6.65 acres of open space and park use, including approximately 0.82-acre of publicly accessible park space, consisting of a 0.68-acre Central Park, a 0.14-acre parklet. Although these park areas would be privately maintained by the development's HOA, they would be publicly accessible to residents of West Sacramento. It is anticipated that residents within the proposed development would primarily use these on-site recreational amenities, thereby reducing potential demand on existing City park facilities. Therefore, the proposed project would be consistent with Policy PR-1.2 of the City's General Plan.
Policy PR-1.6. The City shall require that neighborhood parks be integrated into, and be focal points of new residential neighborhoods.	**Consistent.** The proposed project would include approximately 6.65 acres of open space consisting of the Central Park, parklet, landscape lots, and the detention basin. The Central Park would be designed as a large community space with a walkway leading to a fountain and a large community shade structure intended for social gatherings, farmers markets, and community events. The parklet would be located at the corner of Marshall Road and Otis Avenue, adjacent to the roundabout, and would include entry monumentation signage and trellis, walkways, benches, and a turf area. The proposed parklet would serve as focal points of the new residential neighborhood. Therefore, the project would be consistent with Policy PR-1.6 of the City's General Plan.
Policy PR-5.1. The City shall promote the provision of private open space and recreation facilities in large-scale residential developments in order to meet a portion of the open space and recreation needs that will be generated by the development.	**Consistent.** The proposed project would include approximately 6.65 acres of open space consisting of the Central Park, parklet, landscape lots, and the detention basin. The proposed open spaces would support the recreation needs of future residents of the proposed project. Therefore, the proposed project would be consistent with Policy PR-5.1 of the City's General Plan.
Natural and Cultural Resources Element	
Goal NCR-2. To protect sensitive native vegetation and wildlife communities and habitat in West Sacramento.	**Consistent.** As discussed in Section 4.4, Biological Resources, implementation of the proposed project would involve ground disturbance across the approximately 60-acre project site, permanently converting approximately 58.34 acres of ruderal grassland to developed land uses. (Please note that the combined area of the five parcels that make up the project site totals an actual 58.34 acres but is rounded up by the tax assessor to 60 acres. Accordingly, the project site is described as approximately 60 acres while the Biological Survey Area (BSA) reflects the project site acreage of the combined five parcels per the tax assessor database). This conversion would result in the permanent loss of potential foraging habitat for Swainson's hawk, a State-threatened species, and white-tailed kite, a California fully protected species.

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	Although no nesting habitat for either species occurs on-site, construction activities could indirectly disturb nesting birds protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code. Implementation o**f Mitigation Measures BIO-1** through **BIO-4** would require pre-construction surveys, establishment of no-disturbance buffers, coordination with California Department of Fish and Wildlife (CDFW) and United States Fish and Wildlife Service (USFWS) as necessary, and payment of Yolo Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP) habitat fees to offset the loss of foraging habitat. These measures would reduce impacts to less-than-significant levels. Therefore, the project would be consistent with Goal NCR-2.
Policy NCR-2.4. The City shall require site-specific surveys for discretionary development proposals that could potentially impact biological resources to determine if any significant wildlife habitat and vegetation resources will be adversely affected and, if so, to identify appropriate measures to avoid or mitigate such impacts.	**Consistent.** As discussed in Section 4.4, Biological Resources, a general biological survey and vegetation mapping were completed on April 4, 2025, to evaluate potential impacts to sensitive biological resources. No special-status plant species were observed, and none are expected to occur. However, the site provides moderate-quality foraging habitat for Swainson's hawk (State-threatened) and low-quality foraging habitat for white-tailed kite (fully protected). The proposed project would permanently remove this habitat, including habitat used by other nesting birds, resulting in potential adverse effects on these species**.** Implementation of **Mitigation Measures BIO-1** through **BIO-4** would reduce these impacts to less than significant. Therefore, the proposed project would be consistent with Policy NCR-2.4 of the City's General Plan.
Policy NCR-2.7. The City shall preserve rare, threatened, and endangered species by ensuring that development does not adversely affect such species or by fully mitigating adverse effects. For developments where adverse impacts cannot be mitigated, the City shall not approve the project.	**Consistent.** Please refer to Goal NCR and Policy NCR 2.4. above. The proposed project would be consistent with Policy NCR-2.7 of the City's General Plan.
Policy NCR-2.9. The City shall require new development to ensure no net loss of State and Federally regulated wetlands, other waters of the United States (including creeks, rivers, ponds, marshes, vernal pools, and other seasonal wetlands), and associated functions and values by regulating development in and near these habitats and promoting projects that avoid sensitive areas. Where habitat loss is unavoidable, the City shall require replacement consistent with State and Federal regulations protecting wetland resources.	As discussed in Section 4.4, Biological Resources, no wetlands or other waters of the United States or State were identified within the project site during the filed survey. The nearest aquatic features, a 6.29-acre freshwater pond and a 3.39-acre pond, are located approximately 150 and 600 feet west of the site, respectively, and are hydrologically isolated from the project area. Because the project would not alter drainage patterns or encroach on these resources, it would not impact wetlands or jurisdictional waters. Therefore, the project would be consistent with Policy NCR-2.9.
Goal NCR-5. To preserve and protect West Sacramento's water resources and supply.	**Consistent.** The proposed project would be designed to comply with water efficiency conservation requirements under CCR, Title 24, to preserve and protect the City's water resources and supply. Therefore, the proposed project would be consistent with Goal NCR-5 of the City's General Plan.

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Relevant General Plan Goals/Policies	Consistency Analysis
Policy NCR-5.3. The City shall protect and require new development to preserve, where feasible, areas that provide important groundwater recharge and stormwater management benefits such as undeveloped open spaces, natural habitat, riparian corridors, wetlands, and natural drainage areas.	**Consistent.** Recharge to the Yolo Groundwater Subbasin occurs primarily through seepage from surface waters, including the Sacramento River. During construction, existing drainage patterns at the project site would generally be maintained and construction activities at the project site would not impede natural infiltration from the Sacramento River. Therefore, construction of the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. The proposed project would not use groundwater during operation. Therefore, operation of the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. Therefore, the proposed project would be consistent with Policy NCR-5.3 of the City's General Plan.
Goal NCR-7. To increase energy independence and reduce greenhouse gas emissions through the use of renewable energy sources and improved energy conservation and efficiency.	**Consistent.** The proposed project would be designed to comply with the energy conservation requirements included in the CCR Title 24. Therefore, the proposed project would be consistent with Goal NCR-7 of the City's General Plan.
Policy NCR-7.4. The City shall require, to the extent feasible, site and building design that reduces exterior heat gain and heat island effects (e.g., tree planting, reflective paving materials, covered parking, cool roofs).	**Consistent.** The proposed project would be designed to comply with the energy conservation requirements included in the CCR, Title 24. The proposed residential units would feature passive use solar heating and cooling, natural ventilation, energy-efficient windows (such as Low E Vinyl, Argon Glass Filled Low E, or Low E Wood Frame), solar roofs, green roofs, or cool roof systems, and energy-efficient home appliances. Therefore, the proposed project would be consistent with Policy NCR-7.4 of the City's General Plan.
Policy NCR-7.7. The City shall encourage the use of "EPA Energy Star" certified appliances (e.g., water heaters, swimming pool heaters, cooking equipment, refrigerators, furnaces and boiler units) for new private development and public facilities.	**Consistent.** The proposed project would be designed to comply with the energy conservation requirements included in the CCR, Title 24. Future residents may use "EPA Energy Star" appliances in the proposed single-family lots. Therefore, the proposed project would be consistent with Policy NCR-7.7 of the City's General Plan.
Policy NCR-8.2. The City shall require new development to be sited and designed to visually complement the natural environment, which include features such as the Sacramento River, Sacramento Deepwater Ship Channel, agricultural fields, and other natural landscapes.	**Consistent.** The project site is bounded to the north by Marshall Road and residential development in the Bridgeway Island Village neighborhood, to the east by Otis Avenue and a mix of agricultural and residential uses, to the south by single-family residential uses in the Bridgeway Lakes neighborhood, and to the west by an existing retention pond that is part of the Bridgeway Lakes Community Park and the Bridgeway Lakes neighborhood. The proposed project would result in an incremental increase in new residential development that would alter the existing visual character of the project site. However, the visual character of the entire area would be preserved through adherence to the architectural and landscape design guidelines outlined in the Southport Framework Plan Design Guidelines and the design guidelines created for the proposed project. Furthermore, the proposed project would be consistent with other regulations governing scenic quality, including those outlined in the City's General Plan and the City's Municipal Code. Therefore, the proposed project would be consistent with Policy NCR-8.2 of the City's General Plan.

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Relevant General Plan Goals/Policies	Consistency Analysis
Policy NCR-8.3. The City shall require project designs, lighting configurations, and operational practices that reduce light pollution and preserve views of the night sky.	**Consistent.** The proposed future development would include the installation of 14-foot pedestrian-scaled streetlights along residential local streets and 28-foot primary streetlights on residential collector streets along Marshall Road and Otis Avenue. All lighting would use energy-efficient light emitting diode (LED) fixtures. Additionally, lighted bollards would be installed to provide illumination at the pedestrian scale and would be located throughout the parklet and the Central Park. Lighting associated with the proposed project would be consistent with City standards, and all lighting on the project site would comply with Section 17.22.080 Lighting and Illumination of the City's Municipal Code. Therefore, the proposed project would be consistent with Policy NCR-8.3 of the City's General Plan.
Policy NCR-8.5. The City shall require new development to incorporate design features that prevent excessive glare.	**Consistent.** Lighting associated with the proposed project would be consistent with City standards, and all lighting on the project site would comply with Section 17.22.080 Lighting and Illumination of the City's Municipal Code, which requires that all lighting comply with the requirements in the Illuminating Engineering Society of North America (IESNA) for "cut off" or "full cut off" luminaries, functional and aesthetic design, and light shielding to prevent light trespass or glare onto adjacent properties. Therefore, the proposed project would be consistent with Policy NCR-8.5 of the City's General Plan.
Natural and Cultural Resources Element	
Goal NCR-9. To preserve and enhance West Sacramento's important historical, archaeological, and paleontological resources to increase awareness of the City's heritage.	**Consistent.** Refer to Section 4.5, Cultural Resources, for a detailed discussion of the proposed project's potential impacts on cultural and paleontological resources. As stated in Section 4.5, the records search and pedestrian field survey did not identify the presence of known cultural resources on or within the immediate vicinity of the project site. Although the field survey did not identify any cultural resources within the project area, the designation of the eastern portion of the project area as a tribal cultural landscape in conjunction with known previously demolished historic buildings and agricultural use within the project area indicates an increased probability for surface and subsurface prehistoric and historic resources. As such, should archaeological deposits be encountered during project ground disturbance, implementation of **Mitigation Measure CUL-1** and **Mitigation Measure TCR-1**, would be required to reduce potential impacts to historical and or archaeological resources. Therefore, proposed project would be consistent with Goal NCR-9 of the City's General Plan.
Policy NCR-9.2. The City shall consult with appropriate organizations and individuals early in the development process [e.g., Information Centers of the California Historical Resources Information System, the NAHC; applicable Native American tribes and/or individuals; and historical societies and organizations] to minimize impacts to cultural resources.	**Consistent.** Refer to Section 4.5, Cultural Resources, for a detailed discussion of the consultation process. A records search of the project site was conducted on April 28, 2025, through the NWIC. According to the data obtained from the NWCIC records search, one cultural resource has been documented within the project area (57-001628) and another two cultural resources have been documented within 0.25 mile of the project area (57-001628 and 57-000737). A Sacred Lands File search and list of Tribes to consult was requested from the NAHC on March 27, 2025. On May 16, 2025, the City provided notice of the proposed project to the

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	Native American contacts provided by the NAHC and the tribes that had previously requested such notice under AB 52 and invited Native American tribes to request consultation in response to the notice, pursuant to provisions of AB 52 and SB 18. Consultation occurred pursuant to AB 52 and SB 18. Consultation is considered closed. For addition discussion regarding tribal consultation, please refer to Section 4.18 Tribal Cultural Resources. Therefore, the proposed project would be consistent with Policy NCR-9.2 of the City's General Plan.
Policy NCR-9.15. For development and infrastructure projects, the City shall endeavor to identify sensitive resources early in project design efforts to avoid (e.g., to allow preservation in place) or minimize impacts.	**Consistent.** The Cultural Resources Assessment prepared for the proposed project (see **Appendix D**) did not identify any sensitive resources in the project area that would require project design efforts to avoid or minimize efforts. Refer to Section 4.5, Cultural Resources, for mitigation measures related to inadvertent discovery of archaeological resources during ground disturbing activities. Therefore, the proposed project would be consistent with Policy NCR-9.15 of the City's General Plan.
	Safety Element
Goal S-1. To ensure that City emergency response procedures are adequate in the event of natural or man-made disasters.	**Consistent.** All proposed streets within the proposed development would be designed in accordance with the CFC to allow fire truck access. The proposed project would not interfere with emergency operations and evacuations. Therefore, the proposed project would be consistent with Goal S-1 of the City's General Plan.
Policy S-1.6. The City shall ensure that emergency access is an integral part of the design of all new development.	**Consistent.** The project perimeter and internal roadways would be developed and maintained to allow for the safe and unobstructed passage of emergency response vehicles. The proposed project would include frontage improvements to the existing roadway network and development of an internal roadway network consistent with City design standards. In addition, the proposed internal circulation system would be designed to a width sufficient to accommodate emergency vehicles pursuant to the CFC requirements, the City, and the WSFD. In addition, prior to project approval, the WSFD would review the final site plan to ensure that adequate emergency access to the development area is provided. Therefore, the proposed project would be consistent with Policy S-1.6 of the City's General Plan.
Goal S-2. To prevent loss of life, injury, and property damage due to flooding.	**Consistent.** The entire city, including the project site, is within the natural floodplain of the Sacramento River and is surrounded on all sides by a series of levees designed to provide flood protection. Therefore, the proposed project would be consistent with Goal S-2 of the City's General Plan.
Policy S-2.2. The City shall evaluate and regulate development in areas subject to flooding in accordance with local, State, and Federal requirements to avoid or minimize the risk of flood damage.	**Consistent.** The proposed project would be required to coordinate with the West Sacramento Area Flood Control Agency (WSAFCA) regarding the levee conditions in the surrounding area and maintenance needs. As discussed in Section 4.10, Hydrology and Water Quality, FEMA designates the project site as Zone X, meaning that the project site is within an area protected from the 1-percent-annual-chance (100-year) flood by a levee, dike, or other structures subject to possible failure or overtopping during larger flood. Because the project site is protected from flooding by an existing levee system, the project site is not currently within the

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	FEMA-designated 1 percent -chance-annual-floodplain (100-year floodplain). However, the City's General Plan establishes a 200-year level of flood protection as the standard for the city. According to the City's General Plan EIR and modeled flood inundation areas for the 200-year flood event, portions of the project site would be inundated during a 200-year flood event. Even though the proposed project may be subject to flood inundation, the development within the established levee system would not increase base flood height elevations in violation of FEMA standards as the project site is designated as Zone X by FEMA. Therefore, the proposed project would be consistent with Policy S-2.2 of the City's General Plan.
Policy S-2.5. The City shall require, for areas protected by levees, all new developments to include a notice within the deed that the property is protected by flooding from a levee and that the property can be subject to flooding if the levee fails or is overwhelmed.	**Consistent.** The proposed project would be required to include a notice within the deed that alerts future tenants and owners that the project site is protected by flooding from a levee and that the project site could be subject to flooding if the levee fails or is overwhelmed. Therefore, the proposed project would be consistent with Policy S-2.5 of the City's General Plan.
Policy S-2.11. The City shall require evaluation of potential flood hazards prior to approval of development projects to determine whether the proposed development is reasonably safe from flooding and consistent with California Department of Water Resources (DWR) Urban Level of Flood Protection Criteria. The City shall not approve new development or a subdivision or enter into a development agreement for any property within a flood hazard zone unless the adequacy of flood protection specific to the area has been demonstrated.	**Consistent.** As discussed above in Policy S-2.2, FEMA designates the project site as Zone X, meaning that the project site is within an area protected from the 1-percent-annual-chance (100-year) flood by a levee, dike, or other structures subject to possible failure or overtopping during a larger flood. Because the project site is protected from flooding by an existing levee system, the project site is not currently within the FEMA-designated 1 percent -chance-annual-floodplain (100-year floodplain). However, the City's General Plan establishes a 200-year level of flood protection as the standard for the city. Even though the proposed project may be subject to flood inundation, the development within the established levee system would not increase flood risk relative to existing conditions, as the project site is designated as Zone X by FEMA and is considered protected from the 1 percent annual chance flood by the existing levee system. In addition, the proposed project would be required to comply with Chapter 15.50 of the City's Municipal Code through the construction of flood management improvements other mitigation measures beyond those set forth in City's Floodplain Management Ordinance (Title 18 of the Municipal Code), or the payment of an in-lieu flood-protection fee, as detailed in **Regulatory Compliance Measure WQ-4**. Therefore, the proposed project would be consistent with Policy S-2.11 of the City's General Plan.
Policy S-2.12. The City shall require new development located within a special (100-year) flood hazard area to be designed to minimize the risk of damage in the event of a flood.	**Consistent.** Please refer to Policy S-2-11 above.
Policy S-2.17. The City shall require all new development to consider the risks of dam inundation.	**Consistent.** According to the California Department of Water Resources Division of Safety of Dams, the project site is not located within a dam inundation area. The proposed project would not have risks related to dam inundation. Therefore, the proposed project would be consistent with Policy S-2.17 of the City's General Plan.

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Policy S-2.18. The City shall require new development that would be located in areas subject to flood hazards to provide disclosure information to future homebuyers and tenants. Regarding the status of flood protection within the community, the purchase of flood insurance by property owners, and evacuation plans.	**Consistent.** The future homebuyers would be notified that the new development is located in an area protected by flooding from a levee that could be subject to flooding If the levee fails or is overwhelmed. Therefore, the proposed project would be consistent with Policy S-2.18 of the City's General Plan.
Policy S-2.43. The City shall regulate development within floodplains in accordance with State and Federal requirements and maintain the City's eligibility under the National Flood Insurance Program.	**Consistent.** The entire city, including the project site, is within the natural floodplain of the Sacramento River at the confluence with the American River and is surrounded on all sides by a series of levees designed to provide flood protection. As the project site is protected from flooding by an existing levee system, as discussed below, the project site is not currently within the FEMA-designated 1%-chance-annual (100-year) floodplain. Therefore, the proposed project would be consistent with Policy S-2.43 of the City's General Plan.
Goal S-3. To prevent loss of life, injury, and property damage due to geologic and seismic hazards.	**Consistent.** The analysis of potential geologic and soil-related impacts is based on the site-specific Geotechnical Engineering Report completed for the proposed project. West Sacramento is in a region of California with relatively low seismic activity. The proposed development would be constructed in conformance with the California Building Code (CBC) and implementation of design recommendations in the Geotechnical Engineering Report. Therefore, the proposed project would be consistent with Goal S-3 of the City's General Plan.
Policy S-3.1. The City shall require that new structures are able to withstand the effects of seismic activity, including liquefaction, within the limits of technical and economic feasibility.	**Consistent.** Refer to Section 4.7, Geology and Soils, of this EIR for a detailed discussion of liquefaction. The project site was evaluated for liquefaction potential as part of the Geotechnical Engineering Report. Based on the results of subsurface exploration and known geologic, seismic, and soil conditions, potential for liquefaction occurring at the project site during seismic events is low and therefore project design does not need to address this soil condition. Therefore, the proposed project would be consistent with Policy S-3.1 of the City's General Plan.
Policy S-3.2. The City shall require new development seeking a discretionary permit to prepare a geotechnical report or other appropriate analysis, and incorporate appropriate mitigation measure to ensure new structures are able to withstand the effects of seismic activity, including liquefaction.	**Consistent.** A Geotechnical Engineering Report was prepared for the proposed project and is provided in **Appendix E** of this Draft EIR. Refer to Section 4.7, Geology and Soils, for a detailed discussion of mitigation measures implemented to reduce potentially significant impacts related to seismic ground shaking, liquefaction, and paleontological resources to a less than significant level. Therefore, the proposed project would be consistent with Policy S-3.2 of the City's General Plan.
Goal S-4. To alleviate the effects of climate change by reducing greenhouse gas emissions and adapting to expected climate change impacts.	**Consistent.** Refer to Section 4.8, Greenhouse Gas Emissions, for a detailed analysis of the proposed project's greenhouse gas (GHG) impacts. The project is estimated to generate approximately 4,532.5 MT CO2e per year, which is below the Yolo-Solano Air Quality Management District (YSAQMD) threshold of 10,000 MT CO_2e/year for new land use development projects. The project incorporates measures consistent with the City's Climate Action and Adaptation Plan (CAAP), including all-electric residential units, EV-ready infrastructure, and pedestrian/bicycle connectivity.

Table 4.11.C: General Plan Consistency Analysis

Relevant General Plan Goals/Policies	Consistency Analysis
	Because the project would not exceed applicable GHG thresholds and implements CAAP strategies, it is consistent with Goal S-4.
Goal S-5. To improve air quality in West Sacramento and the Sacramento Region, and protect residents from the potential effects of decreased air quality.	Refer to Section 4.3, Air Quality, for a detailed discussion of the proposed project's air quality impacts. Construction and operational activities would comply with applicable State and local air quality regulations and would not conflict with regional air quality plans. Short-term construction emissions would be minimized through implementation of **Regulatory Compliance Measure AIR-1** and **Mitigation Measure AIR-1**, which include watering active construction areas, covering trucks hauling dirt, applying soil stabilizers, and using Tier 3 or higher diesel engines. Long-term operational emissions would remain below YSAQMD thresholds, and sensitive receptors would not be exposed to substantial pollutant concentrations. Accordingly, the project is consistent with Goal S-5 of the City's General Plan.
Policy S-5.10. The City shall enforce State idling laws for commercial vehicles, including delivery and construction vehicles. The City shall also encourage the use of electrical outlets in loading zones, including signage, to reduce vehicle idling associated with operating refrigeration for delivery trucks.	**Consistent.** Refer to Section 4.3, Air Quality, for a detailed discussion on the proposed project's impacts on air quality. The proposed project would be subject to YSAQMD's Rule 2.11 for PM control during construction. These control measures are intended to reduce the amount of PM10 emissions during the construction period. Implementation of the fugitive dust control measures outlined in **Regulatory Measure AIR-1** would ensure that the proposed project complies with Rule 2.11, further reducing the short-term construction-period air quality impacts.
Goal S-6. To minimize exposure to the potentially harmful effects of hazardous materials and waste on West Sacramento residents.	**Consistent.** Refer to Section 4.9, Hazards and Hazardous Materials, of this EIR for a detailed discussion on the proposed project's impacts on hazards and hazardous materials. Any hazardous materials associated with construction or operation of the proposed project would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local standards and regulations. Therefore, the proposed project would be consistent with Policy S-6.4 of the City's General Plan.
Policy S-6.5. The City shall require the necessary level of environmental review for development applications to ensure that soils, groundwater, and buildings affected by hazardous materials would not affect the environment or health of future property owners or users.	**Consistent.** A Phase I Environmental Site Assessment (ESA) was prepared for the proposed project and included as **Appendix F** to this EIR. The Phase I ESA identified potential Recognized Environmental Conditions (RECs), Controlled Recognized Environmental Conditions (CRECs), and Historical Recognized Environmental Conditions (HRECs). As such, during project construction, potential hazards could occur through the disturbance and transport of soils containing residual pesticides/herbicides or from encountering buried materials. Section 4.9, Hazards and Hazardous Materials of this EIR outlines mitigation measures to reduce potential impacts related to the presence of two RECs. Therefore, the proposed project would be consistent with Policy S-6.5 of the City's General Plan.
Goal S-7. To protect city residents from the harmful effects of excessive noise and vibration.	**Consistent.** Refer to Section 4.13, Noise. As discussed in Section 4.13, short-term construction noise and vibration would occur during site preparation, grading, and building construction but

Table 4.11.C: General Plan Consistency Analysis

Relevant General Plan Goals/Policies	Consistency Analysis
	would be temporary, intermittent, and attenuate with distance. Long-term traffic noise increases along adjacent roadways would be minimal and below the 3 A-weighted decibel Community Noise Equivalent Level (dBA CNEL) perceptibility threshold. On-site operational noise sources, including HVAC equipment, would comply with the City's exterior and interior noise standards. Vibration from construction equipment and project-generated traffic would remain below thresholds for annoyance or structural damage, ensuring that residents are not exposed to harmful levels of noise or vibration. Therefore, the proposed project would be consistent with Goal S-7 of the City's General Plan.
Policy S-7.1 The City shall require new development of noise-sensitive land uses to mitigate noise impacts where the projected exterior environmental noise levels exceed those shown in Table S-7.1.	**Consistent.** Refer to Section 4.13, Noise. As discussed in Section 4.13, the proposed HVAC equipment would generate noise levels of 66.6 dBA equivalent continuous sound level (L_{eq}) at five feet per HVAC unit. The most conservative assessment of potential impact would be the residences along the border of the proposed southern units, located less than 40 feet away from the closest HVAC unit. After distance attenuation, noise generated from on-site HVAC equipment 40 feet from the proposed buildings and shielding from the existing wall would potentially reach up to 43.5 dBA L_{eq}, which would not exceed the City's exterior daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) noise standards of 55 dBA L_{eq} and 45 dBA L_{eq}, respectively, for residential uses. Therefore, noise associated with the on-site HVAC equipment would not exceed the City's noise standard. Therefore, the proposed project would be consistent with Policy S-7.1 of the City's General Plan.
Policy S-7.2. The City shall require new development to mitigate noise impacts on noise-sensitive uses where the projected increases in exterior noise levels exceed those shown in Table S-7.2.	**Consistent.** Refer to Goal S-7 and Policy S-7.2 above.
Policy S-7.3. The City shall require new development to mitigate noise impacts to ensure acceptable interior noise levels appropriate to the land use type as shown in Table S-7.1.	**Consistent.** Refer to Section 4.13, Noise. As discussed in Section 4.13, based on the expected future exterior noise levels at the project site approaching 64 dBA CNEL, a minimum noise reduction of 19 dBA would be required. The proposed project includes an HVAC system that would allow windows to remain closed. Based on reference information from Transmission loss test reports for various Greenworld windows, standard building construction along with standard windows, typically in the Sound Transmission Class (STC) 25–28 range, a reduction of 25 dBA or more would be achieved. With a reduction of 25 dBA or more, interior noise levels would remain below the interior noise level standard of 45 dBA CNEL as shown in Table S-7.1 of the City's General Plan. As such, the proposed project would be consistent with Policy S-7.3 of the City's General Plan.
Policy S-7.4. The City shall require new stationary uses that are likely to produce noise levels exceeding the noise standards of Table S-7.3 (Noise Level Standards from Stationary Sources) to mitigate noise impacts.	**Consistent.** Refer to Section 4.13, Noise. Noise from the proposed HVAC units at the closest residences would not exceed daytime or nighttime standards from Table S-7.3 of the City's General Plan (55 and 45 dBA L_{eq}, respectively). Therefore, the proposed project would be consistent with Policy S-7.4 of the City's General Plan.

Table 4.11.C: General Plan Consistency Analysis

Relevant General Plan Goals/Policies	Consistency Analysis
Policy S-7.6. The City shall require construction projects and new development anticipated to generate significant amount of vibration to ensure acceptable interior vibration levels at nearby noise-sensitive uses based on Federal Transit Administration criteria as shown in Table S-7.4.	**Consistent.** The proposed project is located in a developed area surrounded by existing residential development. The proposed project would be constructed consistently with Federal Transit Administration (FTA) criteria to ensure acceptable interior vibration levels at nearby noise-sensitive uses. Therefore, the proposed project would be consistent with Policy S-7.6 of the City's General Plan.
Policy S-7.7. The City shall require new development to use site planning and project design to mitigate noise impacts to achieve the standards of Tables S-7.1 and S-7.3. The use of noise barriers shall be used to achieve the noise standards only after all other practical design-related noise mitigation measures have been integrated into the project.	**Consistent.** Refer to Section 4.13, Noise, for a detailed discussion on the proposed project's potential noise impacts. Six-foot tall soundwalls along Marshall Road and Otis Avenue, combined with standard building construction and window design, would reduce exterior noise levels at the nearest residential receptors to below the City's 60 dBA CNEL standard. Interior noise levels would remain below 45 dBA CNEL through standard construction practices, HVAC operation, and window attenuation, achieving a noise reduction of 25 dBA or more. Therefore, the proposed project would be consistent with Policy S-7.7 of the City's General Plan.
Health and Community Element	
Goal HC-2. To support active living through a built environment, a network of parks and open space, and programs that promote physical activity, connectivity, and reduce vehicle miles traveled.	**Consistent.** As discussed in Chapter 3, Project Description, the proposed development would provide a mix of open space and park uses, including a 0.68-acre Central Park, a 0.14-acre parklet, 1.81 acres of landscaped open space, and a 4.02-acre detention basin that would also be used as a recreational field during dry seasons. These recreational areas would be distributed throughout the proposed subdivision and would be designed to support physical activity, outdoor recreation, and community engagement. In addition, the proposed project would promote pedestrian and bicycle connectivity both within the development and to surrounding neighborhoods through the construction of sidewalks, bike lanes and internal access roadways. Therefore, the proposed project would be consistent with Goal HC-2 of the City's General Plan.
Policy HC-2.5. The City shall encourage public and private recreation providers to collaborate with the City, Yolo County Public Health Department, and other public health agencies in designing healthy recreation programs that encourage physical activity.	**Consistent.** Please refer to Goal HC-2 above. The proposed project would be consistent with Policy HC-2.5 of the City's General Plan.

Source: *City of West Sacramento General Plan* (2016).

Southport Framework Plan: The Southport Framework Plan is a long-range planning document that refines and implements the City of West Sacramento's General Plan within the Southport area. While the General Plan remains the City's primary governing land use document, the Southport Framework Plan provides a more detailed framework for achieving its goals in this specific sub-area. The plan establishes four village planning areas, the Northwest Village, the Northeast Village, the Southwest Village, and the Southeast Village. Each village was envisioned to contain its own community services, shops, schools, parks and residential neighborhoods. As such, the Southport Framework Plan provides a foundation for a village-oriented, mixed-use development pattern and is

intended to guide growth in a cohesive, coordinated manner, serving as an alternative to unplanned or fragmented urban sprawl.

The project site is located within the Southwest Village planning area of the Southport Framework Plan, which was originally envisioned to include a mix of residential densities, commercial uses, and public/quasi-public uses. Under the existing RE designation, the project site allows a maximum residential density of one dwelling unit per 2.5 acres (0.4 DUA) and is intended to serve as a low-density transition zone between agricultural lands and urban neighborhoods.

As part of the proposed project, an amendment to the Southport Framework Plan is proposed to change the land use designation from RE to LR to accommodate 259 single-family lots within the approximately 60-acre site. This would result in an overall density of approximately 4.3 DUA, consistent with the R-1-A zoning district, which allows 1.1 to 6.0 DUA, and with the surrounding LR residential neighborhoods. While the proposed project would increase the site's residential density compared to what was originally envisioned under the RE designation, the project would reflect the existing character of the Southwest Village. Additionally, the Southport Framework Plan originally envisioned that the southern villages would transition major uses within or between communities in order to maintain character distinctions and minimize incompatibilities. Each village would demonstrate a transition of density through agricultural clusters and rural designations between villages. Although the proposed project would redevelop the agricultural cluster on the project site that serves as a buffer in between the southern and northern villages, similar land use transitions have occurred in the villages since the adoption of the Southport Framework Plan. Subdivisions located west and south of the project site have been developed as Single Family Residential although the Southport Framework Plan envisioned them as Rural Estate. Overall, the proposed project would support the Southport Framework Plan's broader goal of promoting cohesive, village-oriented growth within the Southport area and reflect the existing character of the Southwest Village. Upon approval, the project would be consistent with the Southport Framework Plan's land use vision.

City of West Sacramento Zoning Ordinance: The City of West Sacramento Zoning Ordinance establishes zoning districts and development standards that implement the General Plan. The project, as proposed, would increase the residential density of the site compared to existing conditions. The project site is currently zoned Residential Rural Estates (RE) under the City's Zoning Ordinance. The RE designation permits the development of single-family detached homes, secondary residential units, limited agricultural uses, public and quasi-public uses, and similar and compatible uses in a rural setting at a maximum density of one dwelling unit per 2.5 acre. [5] The proposed project includes rezoning the project site from RE to Residential One Family (R-1-A). The R-1-A zoning district allows for single-family residential development at densities ranging from 1.1 to 6.0 DUA, consistent with the proposed Low Density Residential (LR) Land Use Designation. The proposed project would include the subdivision of 259 residential lots within an approximately 60-acre site and would have an approximate density of 4.3 DUA. As such, the proposed project would increase the density of the site compared to the existing RE zoning but would remain within the

[5] City of West Sacramento. 2024d. General Plan 2035. January. Website: https://www.cityofwestsacramento.org/government/departments/community-development/planning-division/general-plan-2035 (accessed February 2026).

allowable range of the proposed R-1-A zoning district and would therefore be consistent with the City's Zoning Ordinance and applicable development standards.

Summary. The project, as proposed, is evaluated in this EIR and in the analysis above. As analyzed in the topical sections, implementation of the proposed project, including the GPA amendment to the Southport Framework Plan, and Zoning Map/Code amendment to rezone the site from RE to R-1-A, would not conflict with any applicable plans or policies adopted for the purpose of reducing or avoiding an environmental effect. Mitigation measures identified in the relevant topical sections of this EIR would ensure that potential impacts are avoided or minimized to **less than significant** levels. Therefore, the proposed project would result in **less than significant** impacts related to land use plan consistency, and no mitigation is required.

4.11.7 Cumulative Impacts

Less Than Significant Impact. As defined in Section 15355(b) of the *State CEQA Guidelines*, cumulative impacts refer to the incremental impacts of the project added to other closely related past, present, and reasonably foreseeable probable future projects. The cumulative study area for land use and planning is described in Chapter 4.0; the cumulative project list is provided in Chapter 4.0, **Table 4.A**, and a map of the cumulative project locations is provided in Chapter 4.0, **Figure 4-1**.

The City of West Sacramento is an urbanized area with a wide variety of established land uses. The project site is bounded to the north by Marshall Road, to the east by Otis Avenue and a mix of residential and agricultural uses, to the south by single-family residential uses, and to the west by an existing retention pond that is part of the Bridgeway Lakes Community Park and the Bridgeway Lakes residential development. As previously discussed, the proposed project would require a GPA to the City's existing General Plan and an amendment to the Southport Framework Plan to change the General Plan and Framework Plan designations from RE to LR. It would also require rezoning the site from RE to R-1-A. These amendments would allow the project to be consistent with the City's Zoning Code and planning documents governing the project site. Therefore, the proposed project would not contribute to a pattern of development that adversely impacts adjacent land uses or conflicts with existing on site or surrounding land uses.

As discussed under Threshold 4.11.1, the proposed project would not physically divide an established community because development would occur on an undeveloped lot within existing areas of development. Therefore, the project would have a less than cumulatively considerable impact with respect to the physical division of an established community. As discussed under Threshold 4.11.2, the proposed project would not result in a significant impact with respect to consistency with the City's General Plan, Zoning Ordinance, or Specific Plan because buildout of the proposed project would be consistent with all applicable goals, policies, designations, and regulations.

There are no incompatibilities between the proposed project and planned future projects in the City, which primarily include mixed-use and residential developments. As discussed previously, the proposed project would not divide an established community or conflict with the SACOG 2025 MTP/SCS or any City-adopted plans or policies. Future development applications contemplated within the General Plan Buildout Area would be required to comply with all applicable regulations

and standards related to land use and planning. As such, any future development or redevelopment projects requiring discretionary actions would be subject to environmental review, in accordance with the provisions of CEQA and the *State CEQA Guidelines*.

In addition, all identified cumulative City projects would be reviewed for consistency with adopted land use plans and policies by the City. For this reason, the cumulative projects are anticipated to be consistent with applicable General Plan and zoning requirements, or would be subject to allowable exceptions; further, they would be subject to CEQA, mitigation requirements, and design review. Therefore, the proposed project would not contribute to a significant cumulative land use compatibility impact in the study area, and no mitigation is required.

4.11.8 Level of Significance Prior to Mitigation

The proposed project would result in less than significant impacts related to land use and planning.

4.11.9 Regulatory Compliance Measures and Mitigation Measures

4.11.9.1 Regulatory Compliance Measures

There are no regulatory compliance measures applicable to the proposed project pertaining to land use and planning.

4.11.9.2 Mitigation Measures

The proposed project would not result in significant impacts related to land use and planning, and no mitigation is required.

4.11.10 Level of Significance after Mitigation

The proposed project would result in less than significant impacts related to land use and planning.

4.12 MINERAL RESOURCES

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for the proposed Brar Farms Residential Development Project (proposed project) to impact mineral resources in the City of West Sacramento (City) using methodologies and assumptions from California Geological Survey (CGS) data, the City's General Plan, Yolo County's General Plan, and the Cache Creek Resources Management Plan (CCRMP).[1]

4.12.1 Scoping Process

One comment was received during the scoping period that pertained to mineral resources. This comment addressed the presence of previously abandoned oil, gas, and/or geothermal well on or near the project site, and described the regulatory requirements for well abandonment.

4.12.2 Methodology

Evaluating the potential for project-related activities to impact mineral resources is based on maps, reports, and other data developed by the CGS to locate mineral extraction areas within the City and project area.

4.12.3 Existing Environmental Setting

The Surface Mining and Reclamation Act (SMARA) enacted by the California Legislature in 1975 provides guidelines to assist with the classification and designation of mineral lands. Areas are classified on the basis of geologic factors without regard to existing land uses and ownership. SMARA categorizes areas into four Mineral Resource Zones (MRZs):

- **MRZ-1:** An area where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- **MRZ-2:** An area where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence.
- **MRZ-3:** An area containing mineral deposits of which their significance cannot be properly evaluated.
- **MRZ-4:** An area where information is not adequate enough to be able to assign to any other MRZ zone.

Of these four categories, lands classified as MRZ-2 are of the greatest importance. Such areas are underlain by demonstrated mineral resources or are located where geologic data indicate that significant measured or indicated resources are present. MRZ-2 areas are designated by the California State Mining and Geology Board (SMGB) as being "regionally significant." Such designations require that a Lead Agency's land use decisions involving designated areas are to be made in accordance with its mineral resource management policies and that it considers the

[1] Yolo County. 2019. *Updated Final Cache Creek Resources Management Plan for Lower Cache Creek*. December.

importance of the mineral resource to the region or the State as a whole, not just to the Lead Agency's jurisdiction.

4.12.3.1 Yolo County

The primary mineral resource in Yolo County is mined aggregate located throughout the County. Significant sand and gravel resources within Yolo County are located near Cache Creek. Mining in the County is regulated by the Yolo County Off Channel Mining Plan (OCMP), which is a component of the Cache Creek Area Plan (CCAP). According to the updated OCMP, there are approximately 18,452 acres of MRZ-2 area in the County.

There are numerous natural active and abandoned natural gas fields beneath parts of Yolo County. These gas fields are primarily located in the eastern and southern portions of the County.

4.12.3.2 City of West Sacramento

There are no commercial mining operations in the City of West Sacramento. According to the CGS, there are no mines or areas designated as MRZ-2 (likelihood of mineral deposits) within the City.

4.12.3.3 Oil, Gas, and Methane

The project site and surrounding area are located within the abandoned Greens Lake Gas Field. According to the California Department of Conservation's California Geologic Energy Management Division (CalGEM), Mobil Oil Exploration & Production North American, Inc. operated American Petroleum Institute (API) Well No. 0411320081 on the project site, approximately 80 feet south of Marshall Road.[2] Per CalGEM records, the well spud date (i.e., the date the well was first drilled) was November 3, 1969. The well was ultimately drilled to a depth of 5,000 feet and was never put into production. Records indicate that the well was plugged and abandoned on November 10, 1969. While records show that there are wells located to the southwest in the Bridgeway Lakes neighborhood and to the northwest, there are no other oil or gas wells were identified within the project site.[3]

4.12.4 Regulatory Setting

Federal, State, and local regulations and programs related to mineral resources that are applicable to the proposed project are described below.

4.12.4.1 Federal Regulations

There are no federal regulations that apply to the proposed project with respect to mineral resources.

[2] California Geologic Energy Management Division (CalGEM). n.d. *Well Finder*. Website: https://maps.conservation.ca.gov/doggr/wellfinder/ (accessed February 2026).

[3] California Geologic Energy Management Division (CalGEM). 2018. *WellStar. Well Detail.* Website: https://wellstar-public.conservation.ca.gov/Well/Well/Detail?api=0411320081 (accessed February 2026).

4.12.4.2 State Regulations

Surface Mining and Reclamation Act of 1975. The State of California has recognized that mineral resources are essential to the needs of society and the economic well-being of the State. In 1975, the State Legislature passed the Surface Mining and Reclamation Act (SMARA), Public Resources Code (PRC) Section 2710, et seq. The intent of SMARA is to promote production and conservation of mineral resources, minimize the environmental effects of mining, and ensure mined lands are reclaimed to conditions suitable for alternative uses. Reclaiming land for other uses once mining operations are completed is important for the general health, safety, and welfare of the community. Under SMARA, permits are required for all mining activities commencing operation on or after January 1, 1976. In addition, all new and existing mining operations are required to file a reclamation plan with the appropriate jurisdiction to address how the land would be brought back to a productive status once mining operations cease.

SMARA also requires every lead agency within which a mineral resource's economic value has been classified by the State Geologist or has been designated as having regional economic significance by the SMGB, to establish Mineral Resource Management Policies (MRMPs) for the mineral resources in its General Plan.

Under current SMARA statutes (PRC Section 2763), prior to permitting a use that would threaten the potential to extract minerals in an area designated by the SMGB as having mineral resources of regional or statewide significance, the City must prepare a statement specifying its reasons for permitting the proposed use. In it, the City must consider its MRMPs, balance the mineral values against alternative land uses, and consider the importance of the minerals to their market region as a whole and not just their importance to the City area. This process is designed to ensure that decision-makers weigh the economic and environmental value of nonrenewable mineral resources when determining whether or not to protect existing mineral resources.

4.12.4.3 Regional Regulations

Yolo County Code, Chapter 10-3.101 Cache Creek Area Plan In-Channel Ordinance of Yolo County. This section of the County Code addresses surface mining and reclamation policies and regulations for carrying out the requirements of SMARA and other applicable regulations. Its aim is to prevent or minimize the effects of surface mining operations and ensure that the reclamation of mined lands will provide for the long-term productive use of the mined and reclaimed lands. It also puts in place regulations to protect public health and safety and avoid or minimize adverse effects on the environment.

4.12.4.4 Local Regulations

There are no local regulations that apply to the proposed project with respect to mineral resources.

4.12.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the proposed project would have a significant adverse impact with respect to mineral resources if it would:

Threshold 4.12.1: Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state; or

Threshold 4.12.2: Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

4.12.6 Project Impacts

Potential impacts to mineral resources are discussed below.

Threshold 4.12.1: Would the project result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?

***No Impact*.** According to the Southport Framework Plan Draft EIR,[4] the majority of the Southport area is designated as MRZ-1 and areas bordering the Sacramento River to the east of the site are classified as MRZ-3. Additionally, there are no known mineral resources within the vicinity of the project site. The nearest designated mineral resource area is an approximately 18,452-acre MRZ-2 zone located in Yolo County, about 20 miles northwest of the project area, primarily along Cache Creek.[5] This area is managed under the Off-Channel Mining Plan (OCMP) and lies outside the boundaries of the City of West Sacramento. Therefore, the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region or residents of the state.

As stated above in Section 4.12.3, Existing Environmental Setting, the project site lies within the now abandoned Greens Lake Gas Field and contains one oil well that was drilled, plugged, and abandoned in 1969 without entering into production. According to CalGEM, no active mineral resource extraction is occurring on the site, nor is the project designated as a regionally significant mineral resource recovery site. As such the project would not result in the loss of availability of a known mineral resource and **no impact** would occur.

Threshold 4.12.2: Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. The project site does not contain a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Additionally, upon approval of the proposed project, the site would be designated Low Density Residential (LR) and zoned Residential One Family (R-1-A) through amendments to the General Plan, Southport Framework Plan, and Zoning Map/Code. As noted above under Threshold 4.12.1, there are no mineral resources within the City. Therefore, the proposed project would not result in the loss of availability of a locally important mineral resource recovery site. There would be **no impact**, and no mitigation is required.

4 City of West Sacramento. 1994. *Southport Framework Plan.* March.

5 *Ibid.*

4.12.7 Cumulative Impacts

Less Than Significant Impact. As defined in Section 15355(b) of the *State CEQA Guidelines*, cumulative impacts refer to the incremental impacts of the project added to other closely related past, present, and reasonably foreseeable probable future projects. The cumulative study area for mineral resources is described in Chapter 4.0; the cumulative project list is provided in Chapter 4.0, **Table 4.A**, and a map of the cumulative project locations is provided in Chapter 4.0, **Figure 4-1**. Cumulative impacts on mineral resources are evaluated in the context of both the City and Yolo County.

As indicated in above, implementation of the proposed project would not result in the loss of known mineral resources; however, the cumulative projects in the cumulative input area have the potential to develop on or near land that is designated as an MRZ-1 or -3 as the majority of the Southport area is designated as MRZ-1 and areas bordering the Sacramento River to the east of the site are classified as MRZ-3. Furthermore, no mineral resource extraction is planned to occur on or near the project site, and the project would not impede access to outside mineral extraction activities in the cumulative impact area. The project site is located in an area designated as MRZ-1, which is defined as an area where adequate information indicates that no significant mineral deposits are present or where there is little likelihood of their presence. The site has never been used for mineral resource recovery, and the City's General Plan does not identify it as a locally important mineral resource recovery area.

Additionally, the City's General Plan has not delineated the project site as a locally important mineral resource recovery site. For these reasons, implementation of the proposed project would neither cumulatively contribute to the loss of known mineral resources nor cumulatively contribute to the loss of the development of a site that has been delineated as a locally important mineral resource recovery area by the City. As such, implementation of the proposed project would not result in a cumulatively considerable impact and impacts would be **less than significant**.

4.12.8 Level of Significance Prior to Mitigation

The proposed project would result in no impacts related to mineral resources.

4.12.9 Regulatory Compliance Measures and Mitigation Measures

4.12.9.1 Regulatory Compliance Measures

There are no regulatory compliance measures applicable to the proposed project pertaining to mineral resources.

4.12.9.2 Mitigation Measures

The proposed project would not result in significant impacts related to mineral resources, and no mitigation is required.

4.12.10 Level of Significance after Mitigation

The proposed project would result in no impacts related to mineral resources.

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4.13 NOISE

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for the proposed Brar Farms Residential Development Project (proposed project) to result in impacts in the City of West Sacramento (City) related to noise using the *Noise and Vibration Technical Memorandum* (LSA 2026c)[1] (provided in **Appendix H**) that was prepared for the proposed project and included in this Draft EIR; the City of West Sacramento General Plan; and City of West Sacramento Municipal Code.

4.13.1 Scoping Process

Several comments received during the scoping period addressed noise. These comments raised concerns about the potential for increased noise generation from the proposed project and its effect on the rural environment and wildlife.

4.13.2 Methodology

The evaluation of noise impacts associated with the proposed project includes the following:

- A determination of the short-term construction noise and vibration levels at off-site noise-sensitive uses and comparison to the City's General Plan and Municipal Code Ordinance requirements;
- A determination of the long-term noise levels at off-site noise sensitive uses and comparison of those levels to the City's pertinent noise standards; and
- If necessary, a determination of required mitigation measures, such as noise barriers, to reduce long-term noise impacts from all sources.

The evaluation of noise and vibration impacts was prepared in conformance with appropriate standards, utilizing procedures and methodologies in the City of West Sacramento Noise Element and Municipal Code and Federal Transit Administration (FTA) criteria.

4.13.2.1 Characteristics of Sound

Noise is usually defined as unwanted sound. Noise consists of any sound that may produce physiological or psychological damage and/or interfere with communication, work, rest, recreation, and sleep.

To the human ear, sound has two significant characteristics: pitch and loudness. Pitch is generally an annoyance, while loudness can affect the ability to hear. Pitch is the number of complete vibrations, or cycles per second, of a wave resulting in the tone's range from high to low. Loudness is the strength of a sound that describes a noisy or quiet environment and is measured by the amplitude of the sound wave. Loudness is determined by the intensity of the sound waves combined with the reception characteristics of the human ear. Sound intensity refers to how hard the sound wave strikes an object, which in turn produces the sound's effect. This characteristic of sound can be

[1] LSA. 2026. *Noise and Vibration Technical Memorandum.* July.

precisely measured with instruments. The analysis of a project defines the noise environment of the project area in terms of sound intensity and its effect on adjacent sensitive land uses.

4.13.2.2 Measurement of Sound

Sound intensity is measured through the A-weighted scale to correct for the relative frequency response of the human ear. That is, an A-weighted noise level de-emphasizes low and very high frequencies of sound similar to the human ear's de-emphasis of these frequencies. Unlike linear units (e.g., inches or pounds), decibels are measured on a logarithmic scale representing points on a sharply rising curve.

For example, 10 decibels (dB) is 10 times more intense than 1 dB, 20 dB is 100 times more intense than 1 dB, and 30 dB is 1,000 times more intense than 1 dB. Thirty decibels (30 dB) represent 1,000 times as much acoustic energy as 1 dB. The decibel scale increases as the square of the change, representing the sound pressure energy. A sound as soft as human breathing is about 10 times greater than 0 dB. The decibel system of measuring sound gives a rough connection between the physical intensity of sound and its perceived loudness to the human ear. A 10 dB increase in sound level is perceived by the human ear as only a doubling of the loudness of the sound. Ambient sounds generally range from 30 dB (very quiet) to 100 dB (very loud).

Sound levels are generated from a source, and their decibel level decreases as the distance from that source increases. Sound dissipates exponentially with distance from the noise source. For a single-point source, sound levels decrease approximately 6 dB for each doubling of distance from the source. This drop-off rate is appropriate for noise generated by stationary equipment. If noise is produced by a line source (e.g., highway traffic or railroad operations), the sound decreases 3 dB for each doubling of distance in a hard site environment. Similarly, line sources with intervening absorptive vegetation or line sources that are located at a great distance to the receptor would decrease 4.5 dB for each doubling of distance.

There are many ways to rate noise for various time periods, but an appropriate rating of ambient noise affecting humans also accounts for the annoying effects of sound. The equivalent continuous sound level (L_{eq}) is the total sound energy of time-varying noise over a sample period. However, the predominant rating scales for human communities in the State of California are the L_{eq} and Community Noise Equivalent Level (CNEL) or the day-night average noise level (L_{dn}) based on A-weighted decibels (dBA). CNEL is the time-varying noise over a 24-hour period, with a 5 dBA weighting factor applied to the hourly L_{eq} for noises occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours), and a 10 dBA weighting factor applied to noises occurring from 10:00 p.m. to 7:00 a.m. (defined as sleeping hours). L_{dn} is similar to the CNEL scale but without the adjustment for events occurring during the evening hours. CNEL and L_{dn} are within 1 dBA of each other and are normally interchangeable. The City uses the CNEL noise scale for long-term noise impact assessment.

Other noise rating scales of importance when assessing the annoyance factor include the maximum instantaneous noise level (L_{max}), which is the highest exponential time-averaged sound level that occurs during a stated time period. The noise environments discussed in this analysis for short-term noise impacts are specified in terms of maximum levels denoted by L_{max}, which reflects peak

operating conditions and addresses the annoying aspects of intermittent noise. L_{max} is often used together with another noise scale or noise standards in terms of percentile noise levels in noise ordinances for enforcement purposes. For example, the L_{10} noise level represents the noise level exceeded 10 percent of the time during a stated period. The L_{50} noise level represents the median noise level (i.e., half the time the noise level exceeds this level, and half the time it is less than this level). The L_{90} noise level represents the noise level exceeded 90 percent of the time and is considered the background noise level during a monitoring period. For a relatively constant noise source, the L_{eq} and L_{50} are approximately the same.

Noise impacts can be described in three categories. The first category is audible impacts that refer to increases in noise levels noticeable to humans. Audible increases in noise levels generally refer to a change of 3.0 dB or greater because this level has been found to be barely perceptible in exterior environments. The second category, potentially audible, refers to a change in the noise level between 1.0 and 3.0 dB. This range of noise levels has been found to be noticeable only in laboratory environments. The last category is changes in noise levels of less than 1.0 dB, which are inaudible to the human ear. Only audible changes in existing ambient or background noise levels are considered potentially significant.

4.13.2.3 Characteristics of Vibration

Vibration refers to ground-borne noise and perceptible motion. Ground-borne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors, where the motion may not be discernible. Typically, there is more adverse reaction to effects associated with the shaking of a building. Vibration energy propagates from a source through intervening soil and rock layers to the foundations of nearby buildings. The vibration then propagates from the foundation throughout the remainder of the structure. Building vibration may be perceived by occupants as the motion of building surfaces, the rattling of items on shelves or hanging on walls, or a low-frequency rumbling noise. The rumbling noise is caused by the vibration of walls, floors, and ceilings that radiate sound waves.

Typical sources of ground-borne vibration are construction activities (e.g., blasting, pile driving, and operating heavy-duty earthmoving equipment), steel-wheeled trains, and occasional traffic on rough roads. Problems with both ground-borne vibration and noise from these sources are usually localized to areas within approximately 100 feet of the vibration source, although there are examples of ground-borne vibration causing interference out to distances greater than 200 feet.[2] When roadways are smooth, vibration from traffic, even heavy trucks, is rarely perceptible. It is assumed for most projects that the roadway surface will be smooth enough that ground-borne vibration from street traffic will not exceed the impact criteria; however, the construction of the project could result in ground-borne vibration that may be perceptible.

Ground-borne vibration has the potential to damage buildings. Although it is very rare for typical construction activities to cause even cosmetic building damage, it is not uncommon for construction processes such as blasting and pile driving to cause vibration of sufficient amplitudes to damage

[2] Federal Transit Administration (FTA). 2018. Office of Planning and Environment. *Transit Noise and Vibration Impact Assessment Manual* (FTA Manual). FTA Report 0123. September.

nearby buildings.[3] Ground-borne vibration that may result in damage is usually measured in terms of peak particle velocity (PPV).

4.13.3 Existing Environmental Setting

The Project site is located in West Sacramento, Yolo County, California. This section describes the existing environmental setting within the project area as it relates to noise.

The approximately 60-acre project site is located at the corner of Marshall Road and Otis Avenue, within the western portion of the City of West Sacramento in Yolo County. The project site consists of five parcels (APNs: 045-260-008, -009, -010, 045-270-001,-002). The project site is undeveloped and relatively flat with a gentle slope toward the southwest. Local vehicular access to the project site is provided by way of Jefferson Boulevard, Marshall Road, and Southport Parkway. Regional vehicular access to the project site is provided by Interstate 5 (I-5), and Interstate 80 (I-80), which are located to the east and north of the project site, respectively. The proposed project would require a General Plan Amendment (GPA) to the City's existing General Plan and an amendment to the Southport Framework Plan to change the designations from Rural Estates (RE) to Low-Density Residential (LR). It would also require a Zoning Map/Code amendment to rezone the site from Residential Rural Estates (RE) to Residential One Family (R-1-A).

The proposed project involves the subdivision of an approximately 60-acre property to create 259 lots for future single-family homes, comprising approximately 34.78 acres of residential development and 15 open space lots totaling 6.65 acres. The open space lots would include a 0.68-acre Central Park, a 0.14-acre parklet at the corner of Marshall Road and Otis Avenue, and 1.81 acres of landscaped lots, including a roundabout, distributed throughout the proposed development to provide greenspace and buffers. Additionally, the open space areas would include a 4.02-acre detention basin, which would also serve as a recreational field during dry seasons. The proposed project would also construct local streets to facilitate circulation throughout the proposed residential development, all of which will be public and meet applicable City Standards.

Generally, the proposed streets would have approximately 50 to 60 feet of cross-section right-of-way, and would accommodate 5- to 8-foot-wide sidewalks, landscape strips in-between the curb and sidewalk and Class III bikeways within the proposed development. Improvements adjacent to the project site would include Class II bikeways along Marshall Road and Otis Avenue, and enhanced crosswalks with speed tables and bulb outs. Future homes would include two-car garages and driveways. On-street parking would be available for residents and guests.

4.13.3.1 Sensitive Land Uses in the Project Vicinity

Sensitive land uses are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. Noise-sensitive land uses are generally considered to include residential areas, educational facilities, hospitals, childcare facilities, and senior housing. Land uses that are typically not affected by noise include: industrial, manufacturing, utilities, agriculture, undeveloped land, parking lots, warehousing, liquid and solid waste facilities, salvage yards, and transit terminals. Land uses adjacent to the project site include the following:

- **North:** Existing single-family residential uses opposite Marshall Road;
- **East:** Existing vacant land and single-family residential uses opposite Otis Avenue;
- **South:** Existing single-family residential uses; and
- **West:** Existing pond and single-family residential uses

The nearest sensitive receptors are the following:

- **South:** Existing single-family residential uses adjacent to the project site, approximately 15 feet from the project site property line

- **West**: Existing single-family residential uses adjacent to the project site, approximately 25 feet from the project site property line

4.13.3.2 Existing Noise Environment

The primary existing noise sources in the project area are transportation facilities, including Marshall Road Avenue and Otis Avenue.

In order to assess the existing noise conditions in the area, long-term noise measurements were conducted at the project site. Three long-term, 24-hour measurements were taken from April 10, 2025, to April 11, 2025. The locations of the noise measurements are shown in **Appendix H,** and the results are summarized in **Table 4.13.A: Existing Noise Level Measurements.**

4.13.3.3 Existing Aircraft Noise Levels

The project site is approximately 4 miles northwest of Sacramento Executive Airport and approximately 10.4 miles south of Sacramento International Airport. Based on the Airport's noise contour map 6, the site is located well outside the 65 dBA CNEL contour line.

4.13.4 Regulatory Setting

State and local regulations and programs related to noise that are applicable to the proposed project are described below.

4.13.4.1 Federal Regulations

Federal Transit Administration. The United States Department of Transportation Federal Transit Administration (FTA) identifies guidelines for the maximum acceptable vibration levels for different types of land uses. These guidelines are based on the potential for interference or annoyance from vibration levels in a building and the potential for building damage. According to the FTA, ground vibrations from construction activities generally do not reach levels that can damage structures, but they can achieve the audible and feel-able ranges in buildings very close to the construction site.

Exceptions include non-engineered timber and masonry buildings such as residential buildings and old or fragile buildings, where special care must be taken to avoid damage. Construction activity can result in varying degrees of ground-borne vibration, depending on the equipment and methods used, distance to the affected structures, and soil type. Construction vibration is generally

associated with pile driving and rock blasting. Other construction equipment, such as air compressors, light trucks, and hydraulic loaders, generates little or no ground vibration.

Table 4.13.A: Existing Noise Level Measurements

Location Number	Location Description	Daytime Noise Levels[1] (dBA L_{eq})	Evening Noise Levels[2] (dBA L_{eq})	Nighttime Noise Levels[3] (dBA L_{eq})	Average Daily Noise Levels (dBA CNEL)	Primary Noise Sources
LT-1	3296 Bridgeway Lakes Drive, West Sacramento, CA 95691. In a tree, approximately 30 feet west of the Otis Street centerline and 1,600 feet south of Marshall Road.	56.1-66.0	53.6-62.2	45.0-58.4	62.9	Traffic on Otis Avenue and Bridgeway Lakes Drive
LT-2	3415 Marshall Road, West Sacramento, CA 95691. In a tree, approximately 40 feet south of the Marshall Road centerline and 810 feet west of the Otis Avenue centerline.	60.8-63.1	58.2-64.0	46.7-57.7	63.6	Traffic on Marshall Road
LT-3	3570 Almanor Road, West Sacramento, CA 95691. In a tree, approximately 800 feet east of the Southport Parkway center divider and 1,015 feet south of the Marshall Road centerline.	45.1-55.6	42.9-44.0	41.5-53.0	53.8	Background traffic on Southport Parkway

Source: Compiled by LSA (September 2026).
[1] Daytime Noise Levels = noise levels during the hours of 7:00 a.m. to 7:00 p.m.
[2] Evening Noise Levels = noise levels during the hours of 7:00 p.m. to 10:00 p.m.
[3] Nighttime Noise Levels = noise levels during the hours of 10:00 p.m. to 7:00 a.m.
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibels
ft = foot/feet
L_{eq} = equivalent continuous sound level

The criteria for potential building damage from ground-borne vibration and noise are based on the maximum levels for a single event. **Table 4.13.B: Construction Vibration Damage Criteria** lists the potential vibration building damage criteria associated with construction activities, as suggested in the Caltrans Manual.[3]

[3] California Department of Transportation (Caltrans). 2020. *Transportation and Construction Vibration Guidance Manual.* April. Website: https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf (accessed June 2026).

Table 4.13.B: Construction Vibration Damage Criteria

Structure / Condition	PPV (in/sec)
Extremely fragile historic buildings, ruins, ancient monuments	0.08
Fragile buildings	0.10
Historic and some old buildings	0.25
Older residential structures	0.30
New residential structures	0.50
Modern industrial / commercial buildings	0.50

Source: *Transportation and Construction Vibration Guidance Manual,* Table 19 (Caltrans 2020).
Caltrans = California Department of Transportation
in/sec = inch/inches per second
PPV = peak particle velocity

The Caltrans Manual guidelines show that a vibration level of up to 0.3 inches per second (in/sec) in peak particle velocity (PPV) is considered safe for older residential structures which are the types of buildings located on properties adjacent to the project site. Accordingly, the 0.3 in/sec in the PPV threshold was used to evaluate vibration impacts at the nearest structures to the site.

4.13.4.2 State Regulations

California Noise Insulation Standards (Title 24, CCR). Interior noise levels for habitable rooms are regulated by Title 24 of the California Code of Regulations California Noise Insulation Standards. Title 24, Chapter 12, Section 1206.4, of the 2019 California Building Code[4] requires that interior noise levels attributable to exterior sources not exceed 45 CNEL in any habitable room. A habitable room is a room used for living, sleeping, eating, or cooking. Bathrooms, closets, hallways, utility spaces, and similar areas are not considered habitable rooms for this regulation.

Noise Control Act (Health & Safety Code Section 46000-46080). The California Noise Control Act states that excessive noise is a serious hazard to public health and welfare and that it is the policy of the State to provide an environment for all Californians that is free from noise that jeopardizes their health or welfare. The goal is to minimize the number of people that would be exposed to excessive noise but not create an environment completely free from any noise

4.13.4.3 Regional Regulations

There are no regional regulations that apply to the proposed project with respect to noise.

4.13.4.4 Local Regulations

City of West Sacramento 2035 General Plan. The following policies and goals are included in the Safety Element of the General Plan and may be applicable to the proposed project:

[4] State of California. 2019. *Title 24 California Code of Regulations, Chapter 12, Section 1206.4*.

- **Goal S-7:** To protect city residents from the harmful effects of excessive noise and vibration.
    - **Policy S-7.1:** The City shall require new development of noise-sensitive land uses to mitigate noise impacts where the projected exterior noise environmental noise levels exceed those shown in **Table 4.13.C: Noise Compatibility Standards.**
    - **Policy S-7.2:** The City shall require new development to mitigate noise impacts on noise-sensitive uses where the projected increase in exterior noise levels exceed those shown in **Table 4.13.D: Exterior Incremental Noise Impact Standards.**
    - **Policy S-7.3:** The City shall require new development to mitigate noise impacts to ensure acceptable interior noise levels appropriate to the land use type as shown in **Table 4.13.C**, above.

Table 4.13.C: Noise Compatibility Standards

Land Use	Exterior Noise level Standard for Outdoor Activity Areas[a]	Interior Noise Level Standard	
	L_{dn}/CNEL, dB	L_{dn}/CNEL, dB	L_{eq}, dB[b]
Residential (Low Density Residential, Duplex, Mobile Homes)	60[c]	45	N/A
Residential (Multi Family)	65[d]	45	N/A
Transient Lodging (Motels/Hotels)	65[d]	45	N/A
Mixed-Use Developments	70	45	N/A
Schools, Libraries, Churches, Hospitals, Nursing Homes, Museums	70	45	N/A
Theaters, Auditoriums	70	N/A	35
Playgrounds, Neighborhood Parks	70	N/A	N/A
Golf Courses, Riding Stables, Water Recreation, Cemeteries	75	N/A	N/A
Office Buildings, Business Commercial and Professional	70	N/A	45
Industrial, Manufacturing, Utilities, and Agriculture	70	N/A	45

Source: *City of West Sacramento General Plan* (2016).
Where a proposed use is not specifically listed on this table, the use shall comply with the noise exposure standards for the nearest similar use as determined by the Community Development Department.

[a] Outdoor activity areas for residential developments are considered to be the back yard patios or decks of single-family residential units, and the patios or common areas where people generally congregate for multi-family developments. Outdoor activity areas for nonresidential developments are considered to be those common areas where people generally congregate, including outdoor seating areas.
Where the location of outdoor activity areas is unknown, the exterior noise standard shall be applied to the property line of the receiving land use.

[b] As determined for a typical worst-case hour during periods of use.

[c] Where it is not possible to reduce noise in outdoor activity areas to 60 dB, L_{dn}/CNEL or less using a practical application of the best-available noise reduction measures, an exterior level of up 65 dB, L_{dn}/CNEL may be allowed provided that available exterior noise level reduction measures have been implemented and interior noise levels are in compliance with this table.

[d] Where it is not possible to reduce noise in outdoor activity areas to 65 dB, L_{dn}/CNEL or less using a practical application of the best-available noise reduction measures, an exterior level of up 70 dB, L_{dn}/CNEL may be allowed provided that available exterior noise level reduction measures have been implemented and interior noise levels are in compliance with this table.

dB = decibels
CNEL = community noise equivalent level
L_{eq} = equivalent continuous sound level
L_{dn} = day-night average level

Table 4.13.D: Exterior Incremental Environmental Noise Impact Standards for Noise-Sensitive Uses (dBA)

Residences and Buildings Where People Normally Sleep[a]		Institutional Land Uses with Primarily Daytime and Evening Uses[b]	
Existing L_{dn}	Allowable Noise Increment	Existing peak Hour L_{eq}	Allowable Noise Increment
45	8	45	12
50	5	50	9
55	3	55	6
60	2	60	5
65	1	65	3
70	1	70	3
75	0	75	1
80	0	80	0

Source: *City of West Sacramento General Plan (2016)*.
Noise levels are measured at the property line of the noise-sensitive use.
[a] This category includes homes, hospitals, and hotels where a nighttime sensitivity to noise is assumed to be of utmost importance.
[b] This category includes schools, libraries, theaters, and churches where it is important to avoid interference with such activities as speech, meditation, and concentration on reading material.

- **Policy S-7.4:** The City shall require new stationary uses that are likely to produce noise levels exceeding the noise standards of **Table 4.13.E: Noise Level Standards from Stationary Sources** to mitigate noise impacts.

Table 4.13.E: Noise Level Standards from Stationary Sources

Noise level Descriptor	Daytime (7:00 A.M to 10:00 P.M)	Night-time (10:00 P.M to 7:00 A.M)
Hourly L_{eq}, dB	55	45
Maximum level, dB	70	65

Source: *City of West Sacramento General Plan (2016)*.
Noise levels are measured at the property line of the noise-sensitive use.

- **Policy S-7.6:** The City shall require construction projects and new development anticipated to generate a significant amount of vibration to ensure acceptable interior vibration levels at nearby noise-sensitive uses based on Federal Transit Administration criteria as shown in **Table 4.13.F: Ground-borne Vibration Impact Criteria for General Assessment**.

- **Policy S-7.7:** The City shall require new development to use site planning and project design to mitigate noise impacts to achieve the standards of **Tables 4.13.C and 4.13.E**. The use of noise barriers shall be used to achieve the noise standards only after all other practical design-related noise mitigation measures have been integrated into the project.

- **Policy S-7.9:** The City shall seek to minimize noise and other impacts of truck traffic, deliveries, and staging in and adjacent to residential and mixed-use neighborhoods.

Table 4.13.F: Ground-borne Vibration Impact Criteria for General Assessment

Land Use Category	Impact levels (VdB)		
	Frequent Events[1]	Occasional Events[2]	Infrequent Events[3]
Category 1: Buildings where vibration would interfere with interior operations	65[4]	65[4]	65[4]
Category 2: Residences and buildings where people normally sleep	72	75	80
Category 3: Institutional land uses with primarily daytime uses	75	78	83

Source: *City of West Sacramento General Plan (2016)*.
Vibration levels are measured in or near the vibration-sensitive use.
[1] "Frequent events" is defined as more than 70 vibration events of the same source per day.
[2] "Occasional events" is defined as between 30 and 70 vibration events of the same source per day.
[3] "Infrequent events" is defined as fewer than 30 vibration events of the same source per day.
[4] This criterion limit is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes. Vibration-sensitive manufacturing or research will require detailed evaluation to define the acceptable vibration levels.

- **Policy S-7.10:** The City shall require new development that has the potential to generate noise that will exceed the levels contained in **Tables 4.13.C through 4.13. E** and may affect a noise-sensitive use to prepare an acoustical study.

Municipal Code. Section 17.28.110, Noise, of the City's Municipal Code provides direction and criteria related to operational and construction noise and vibration. Additionally, requirements such as acoustic study requirements and applicable noise attenuation measures are identified below.

- Acoustic Study. An acoustic study shall be required for any proposed project which could create or be subject to a noise that exceeds the levels contained in Tables S-7.1 through S-7.4 in the General Plan.

- Noise Attenuation Measures. Any project subject to the acoustic study requirements of subsection A, Acoustic Study, may be required as a condition of approval to incorporate noise attenuation measures deemed necessary to ensure that noise standards are not exceeded.

  - New noise-sensitive uses (e.g., schools, hospitals, churches, and residences) shall incorporate noise attenuation measures to achieve and maintain an interior noise level of 45 dBA.

  - Noise attenuation measures identified in an acoustic study shall be incorporated into the project to reduce noise impacts to satisfactory levels.

  - Emphasis shall be placed upon site planning and project design measures. The use of noise barriers shall be considered and may be required only after all feasible design-related noise measures have been incorporated into the project.

4.13.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the proposed project would have a significant adverse impact with respect to noise if it would:

Threshold 4.13.1: Result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;

Threshold 4.13.2: Result in the generation of excessive groundborne vibration or groundborne noise levels; or

Threshold 4.13.3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels.

4.13.6 Project Impacts

Please refer to Section 4.13.9 for a full text description of the regulatory compliance and/or mitigation measures referenced in the analysis below.

Threshold 4.13.1: Would the project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact with Mitigation Incorporated. Potential impacts related to temporary and permanent increases in ambient noise levels in the vicinity of the project that could exceed standards established in the local General Plan, municipal noise ordinance, or applicable standards of other agencies are discussed below.

Construction Noise Impacts. Project construction would result in short-term noise impacts. Maximum construction noise would be short-term, generally intermittent depending on the construction phase, and variable depending on receiver distance from the active construction zone. The duration of various types of construction noise would vary from one day to several weeks depending on the phase of construction. The levels and types of impacts that may occur during construction are described below.

Two types of short-term noise impacts could occur during construction of the proposed project. First, construction crew commutes and the transport of construction equipment and materials to the project site would incrementally increase noise levels on access roads leading to the site. Although there would be a relatively high single-event noise exposure potential causing intermittent noise nuisance (passing trucks at 50 feet would generate up to 84 dBA L_{max}), the effect on longer-term ambient noise levels would be small when compared to existing daily traffic volumes on

Marshall Road. According to the *Noise and Vibration Technical Memorandum* (**Appendix H**), Marshall Road between Southport Parkway and Martinique Street-Project Driveway 1 has an estimated existing average daily traffic (ADT) volume of 2,510 within the vicinity of the project site. Based on the California Emissions Estimator Model (CalEEMod) model results, during project construction, the grading phase would generate the most trips of all the construction phases and have an acoustical equivalent traffic volume of 3,024 passenger car equivalent vehicles on Marshall Road. Accordingly, construction-related traffic would increase noise levels by up to 3.4 dBA. Although a noise increase of 3 or more would be barely perceptible in an outdoor environment, traffic noise levels at residences along Marshall Road would be below 60 dBA CNEL because the closest residences are 35 feet from the Marshall Road centerline and existing traffic noise levels are 57.4 dBA CNEL at a distance of 56 feet from the Marshall Road centerline. At a distance of 35 feet, noise would increase by 3.1 dBA from 56 feet to a noise level of 60.5 dBA CNEL.[5] In addition, an existing 6-foot-high property wall spans along the residences along Marshall Road and would provide a minimum construction noise reduction of at least 5 dBA. Therefore, traffic noise levels at the closest residence would be approximately 58.9 dBA CNEL, [6] and short-term construction-related impacts associated with worker commute and equipment/material transport to the project site would be less than significant.

The second type of short-term noise impact is related to noise generated during site preparation, grading, building construction, architectural coating, and paving on the project site. Construction is undertaken in discrete steps, each of which has its own mix of equipment, and consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the project site. Therefore, the noise levels vary as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. **Table 4.13.G: Typical Construction Equipment Noise Levels** lists the maximum noise levels recommended for noise impact assessments for typical construction equipment based on a distance of 50 feet between the construction equipment and a noise receptor. Typical operating cycles for these types and pieces of construction equipment may involve 1–2 minutes of full power operation followed by 3–4 minutes at lower power settings.

In addition to the reference maximum noise levels, the usage factors provided in **Table 4.13.G** below, were applied to estimate the hourly noise level from each piece of construction equipment. For each equipment type, reference noise levels at 50 feet were adjusted based on the fraction of time the equipment would operate during a given hour and the distance between the equipment and the nearest sensitive receptor. Because multiple pieces of equipment often operate simultaneously, the noise contributions from individual equipment were combined using standard acoustic methods to determine the composite hourly noise level for each construction phase. Based on this methodology, project construction noise levels at 50 feet are expected to range from approximately 76 dBA L_{eq} to 89 dBA $L_{eq,}$ with the highest noises levels occurring during site preparation and grading (please refer to **Appendix H,** which shows the detailed calculations for this analysis).

5 57.4 dBA + 3.1 dBA = 60.5 dBA

6 60.5 dBA – 5.0 dBA + 3.4 dBA = 58.9 dBA

Table 4.13.G: Typical Construction Equipment Noise Levels

Equipment Description	Acoustical Usage Factor (%)[1]	Maximum Noise Level (L_{max}) at 50 Ft[2]
Auger Drill Rig	20	84
Backhoes	40	80
Compactor (ground)	20	80
Compressor	40	80
Cranes	16	85
Dozers	40	85
Dump Trucks	40	84
Excavators	40	85
Flat Bed Trucks	40	84
Forklift	20	85
Front-end Loaders	40	80
Graders	40	85
Impact Pile Drivers	20	95
Jackhammers	20	85
Paver	50	77
Pickup Truck	40	55
Pneumatic Tools	50	85
Pumps	50	77
Rock Drills	20	85
Rollers	20	85
Scrapers	40	85
Tractors	40	84
Trencher	50	80
Welder	40	73

Source: FHWA Roadway Construction Noise Model User's Guide, Table 1 (FHWA 2006).
Note: Noise levels reported in this table are rounded to the nearest whole number.
[1] Usage factor is the percentage of time during a construction noise operation that a piece of construction equipment is operating at full power.
[2] Maximum noise levels were developed based on Specification 721.560 from the Central Artery/Tunnel program to be consistent with the City of Boston's Noise Code for the "Big Dig" project.
FHWA = Federal Highway Administration
ft = foot/feet
L_{max} = maximum instantaneous sound level

Additionally, **Table 4.13.H: Construction Noise Levels**, shown below, summarizes the expected noise levels at the nearest sensitive uses to the project site, based on their distance from the construction activity center. Construction noise is evaluated using the average hourly noise level (Leq), which corresponds to the representative distance measured from the center of the site. Maximum noise levels at the site boundary would be short-term and intermittent. As shown in **Table 4.13.H**, construction noise levels at the nearest residential property line surrounding the project site would reach up to 64.6 dBA L_{eq} from the center of the project site during daytime hours.

Table 4.13.H: Construction Noise Levels

Land Use	Direction	Reference Noise Level at 50 ft (dBA L_{eq})	Distance[1] (ft)	Distance Attenuation (dBA)	Shielding (dBA)	Noise Level (dBA L_{eq})	FTA Construction Noise Standard (dBA L_{eq})	Exceed FTA Construction Noise Standard?
Residence	North	89.2	835	24.5	5.0[2]	59.7	80	No
Residence	East	89.2	850	24.6	0.0	64.6	80	No
Residence	South	89.2	780	23.9	5.0[2]	60.3	80	No
Residence	West	89.2	855	24.7	5.0[2]	59.5	80	No

Source: Compiled by LSA (2026).
[1] Distance from the center of the project site.
[2] The existing minimum 6 ft high property wall would provide a minimum noise reduction of 5 dBA.
dBA = A-weighted decibels
ft = foot/feet
FTA = Federal Transit Administration
L_{eq} = equivalent continuous sound level

These noise levels would be temporary and would occur only were all construction equipment to operate simultaneously; therefore, these estimates are conservative. Although short-term construction noise could exceed existing ambient noise levels in the project area, noise levels would remain below the FTA's 80 dBA L_{eq} construction noise criterion for residential land uses. However, construction near sensitive receptors could cause temporary noise disturbances, especially if construction actives occurred during more sensitive nighttime hours. Accordingly, construction noise could result in a **potentially significant impact**. Implementation of **Mitigation Measure NOI-1**, which would limit construction activities to 7:00 a.m. to 7:00 p.m. Monday through Saturday, consistent with the City's Draft Noise Ordinance,[7] would ensure construction occurs only during daytime hours and would reduce potential construction noise impacts to a **less than significant** level.

Long-Term Off-Site Traffic Noise Impacts. The FHWA Highway Traffic Noise Prediction Model (FHWA RD-77-108) was used to evaluate traffic-related noise conditions in the vicinity of the project site. This model requires various parameters, including traffic volumes, vehicle mix, vehicle speed, and roadway geometry to compute typical equivalent noise levels during daytime, evening, and nighttime hours. The resultant noise levels are weighted and summed over 24-hour periods to determine the Community Noise Equivalent Level (CNEL) values. The existing and existing plus project traffic volumes in the vicinity of the project site were obtained from the Transportation Study prepared for the proposed project (provided in **Appendix I**). **Table 4.13.I: Traffic Noise levels Without and With Proposed Project** lists the existing traffic noise levels for the without and with project scenarios**.**

In addition, cumulative (buildout) traffic volumes were obtained from the Transportation Study for the proposed project. For purposes of the cumulative analysis, the Enterprise Crossing Project is included as a planned future regional multimodal crossing of the Deep Water Ship Channel in the

[7] City of West Sacramento. 2026. *Draft Noise Ordinance.* Personal communication with Daniel Berumen. July 23.

City of West Sacramento, which is assumed to be in place under cumulative conditions**. Table 4.13.J: Cumulative (Buildout) Traffic Noise Levels Without Enterprise Crossing and Without and With Project** and **Table 4.13.K: Cumulative (Buildout) Traffic Noise Levels With Enterprise Crossing and Without and With Project** present the cumulative traffic noise levels without and with the Enterprise Crossing Project, under both the without-project and with-project conditions. These noise levels represent worst-case scenarios, which assume that no shielding is provided between the traffic and the location where the noise contours are drawn.

As shown in **Tables 4.13.I, 4.13.J, and 4.13.K,** project-related traffic noise increases would be very small, ranging from 0.0 to 2.0 dBA along the analyzed roadway segments, with the greatest increase of up to 2.0 dBA occurring along Marshall Road between Southport Parkway and Driveway 1 under cumulative (buildout) conditions without Enterprise Crossing (**Table 4.13.J**); increases of up to 1.8 dBA would occur along Otis Avenue between Marshall Road and Driveway 3 under existing conditions (**Table 4.13.I**); and increases of up to 0.9 dBA would occur along Marshall Road between Southport Parkway and Driveway 1 and Marshall Road between Driveway 1 and Driveway 2 under cumulative (buildout) conditions without Enterprise Crossing (**Table 4.13.J**). These increases, as compared to existing ambient conditions, would not exceed the applicable significance thresholds (i.e., 3.0 dBA where ambient levels are 65 dBA or less, or 1.0 dBA where ambient levels are 65 dBA or greater). A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, traffic noise from project-related traffic on off-site sensitive receptors would be **less than significant**. No noise mitigation measures are required.

Long-Term Stationary Noise Impacts. This operational noise analysis is intended to describe noise level impacts associated with the expected typical daytime and nighttime activities at the project site. As such it is anticipated that the proposed residences would have HVAC units, which could operate 24 hours per day. Based on previous measurements as found in (Appendix H), the HVAC equipment would generate noise levels of 66.6 dBA L_{eq} at 5 feet per HVAC unit. The most conservative assessment of potential impact would be the residences along the border of the proposed southern units, located approximately 40 feet away from the closest HVAC unit. After distance attenuation, noise generated from on-site HVAC equipment 40 feet from the proposed buildings and shielding from the existing fence would potentially reach up to 43.5 dBA L_{eq}, which would not exceed the City's exterior daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) noise standards of 55 dBA L_{eq} and 45 dBA L_{eq}, respectively, for residential uses. Therefore, noise associated with the on-site HVAC equipment would not exceed the City's noise standard and would be less than significant.

Table 4.13.I: Existing Traffic Noise Levels Without and With Project

Roadway Segment	Without Project Traffic Conditions					With Project Traffic Conditions					
	ADT	Centerline to 70 dBA CNEL (ft)	Centerline to 65 dBA CNEL (ft)	Centerline to 60 dBA CNEL (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane	ADT	Centerline to 70 dBA CNEL (ft)	Centerline to 65 dBA CNEL (ft)	Centerline to 60 dBA CNEL (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane	Increase from Baseline Conditions (dBA)
Marshall Road west of Southport Parkway	760	< 50	< 50	< 50	52.2	760	< 50	< 50	< 50	52.2	0.0
Marshall Road between Southport Parkway and Martinique Street-Project Driveway 1	2,510	< 50	< 50	< 50	57.4	2,850	< 50	< 50	< 50	57.9	0.5
Marshall Road between Martinique Street-Project Driveway 1 and Jamaica Street-Project Driveway 2	2,950	< 50	< 50	< 50	58.1	3,520	< 50	< 50	55	58.8	0.7
Marshall Road between Jamaica Street-Project Driveway 2 and Guadelupe Street	3,130	< 50	< 50	< 50	58.3	4,300	< 50	< 50	62	59.7	1.4
Marshall Road between Guadelupe Street and Otis Avenue	3,420	< 50	< 50	54	58.7	4,590	< 50	< 50	65	60.0	1.3
Marshall Road between Otis Avenue and Golden Gate Drive	4,880	< 50	< 50	67	60.2	6,860	< 50	< 50	84	61.7	1.5
Marshall Road between Golden Gate Drive and Jefferson Boulevard	9,025	< 50	< 50	100	62.9	11,005	< 50	54	114	63.8	0.9
Southport Parkway north of Marshall Road	3,180	< 50	< 50	< 50	57.6	3,470	< 50	< 50	58	58.0	0.4
Southport Parkway south of Marshall Road	3,990	< 50	< 50	59	59.4	4,040	< 50	< 50	60	59.5	0.1
Otis Avenue between Marshall Road and Driveway 3	1,920	< 50	< 50	< 50	52.7	2,910	< 50	< 50	< 50	54.5	1.8
Otis Avenue between Driveway 3 and Driveway 4	1,920	< 50	< 50	< 50	52.7	2,190	< 50	< 50	< 50	53.3	0.6
Otis Avenue south of Driveway 4	1,920	< 50	< 50	< 50	52.7	2,040	< 50	< 50	< 50	53.0	0.3
Jefferson Boulevard north of Marshall Road	14,180	< 50	95	202	67.8	16,020	< 50	102	219	68.4	0.6
Jefferson Boulevard south of Marshall Road	7,060	< 50	60	127	64.8	7,200	< 50	61	129	64.9	0.1

Source: Compiled by LSA (2026).
ADT = average daily traffic
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibel
ft = foot/feet

Table 4.13.J: Cumulative (Buildout) Traffic Noise Levels Without Enterprise Crossing and Without and With Project

Roadway Segment	Without Project Traffic Conditions					With Project Traffic Conditions					
	ADT	Centerline to 70 dBA CNEL (ft)	Centerline to 65 dBA CNEL (ft)	Centerline to 60 dBA CNEL (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane	ADT	Centerline to 70 dBA CNEL (ft)	Centerline to 65 dBA CNEL (ft)	Centerline to 60 dBA CNEL (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane	Increase from Baseline Conditions (dBA)
Marshall Road west of Southport Parkway	930	< 50	< 50	< 50	53.0	930	< 50	< 50	< 50	53.0	0.0
Marshall Road between Southport Parkway and Driveway 1	2,675	< 50	< 50	< 50	57.6	3,305	< 50	< 50	53	58.5	0.9
Marshall Road between Driveway 1 and Driveway 2	3,120	< 50	< 50	< 50	58.3	3,810	< 50	< 50	58	59.2	0.9
Marshall Road between Driveway 2 and Otis Avenue	3,480	< 50	< 50	54	58.8	4,230	< 50	< 50	62	59.6	0.8
Marshall Road between Otis Avenue and Golden Gate Drive	7,000	< 50	< 50	85	61.8	8,390	< 50	< 50	95	62.6	0.8
Marshall Road between Golden Gate Drive and Seymour Avenue	9,620	< 50	< 50	104	63.2	10,920	< 50	54	113	63.7	0.5
Marshall Road between Seymour Avenue and Rivermont Street-Allan Drive	8,820	< 50	< 50	98	62.8	10,120	< 50	< 50	108	63.4	0.6
Marshall Road between Rivermont Street-Allan Drive and Jefferson Boulevard	10,020	< 50	< 50	107	63.4	11,320	< 50	55	116	63.9	0.5
Southport Parkway north of Marshall Road	7,460	< 50	< 50	91	61.3	8,070	< 50	< 50	95	61.6	0.3
Southport Parkway south of Marshall Road	8,200	< 50	< 50	94	62.6	8,220	< 50	< 50	94	62.6	0.0
Otis Avenue between Marshall Road and Driveway 3	3,980	< 50	< 50	< 50	55.9	4,720	< 50	< 50	< 50	56.6	0.7
Otis Avenue between Driveway 3 and Driveway 4	3,980	< 50	< 50	< 50	55.9	4,520	< 50	< 50	< 50	56.4	0.5
Otis Avenue south of Driveway 4	3,980	< 50	< 50	< 50	55.9	4,320	< 50	< 50	< 50	56.2	0.3
Jefferson Boulevard north of Marshall Road	21,960	59	126	271	69.7	23,230	62	131	281	70.0	0.3
Jefferson Boulevard south of Marshall Road	14,160	< 50	94	202	67.8	14,190	< 50	95	202	67.8	0.0

Source: Compiled by LSA (2026).
ADT = average daily traffic
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibel
ft = foot/feet

Table 4.13.K: Cumulative (Buildout) Traffic Noise Levels With Enterprise Crossing and Without and With Project

Roadway Segment	Without Project Traffic Conditions					With Project Traffic Conditions					
	ADT	Centerline to 70 dBA CNEL (ft)	Centerline to 65 dBA CNEL (ft)	Centerline to 60 dBA CNEL (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane	ADT	Centerline to 70 dBA CNEL (ft)	Centerline to 65 dBA CNEL (ft)	Centerline to 60 dBA CNEL (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane	Increase from Baseline Conditions (dBA)
Marshall Road west of Southport Parkway	880	< 50	< 50	< 50	52.8	880	< 50	< 50	< 50	52.8	0.0
Marshall Road between Southport Parkway and Driveway 1	2,065	< 50	< 50	< 50	56.5	3,265	< 50	< 50	52	58.5	2.0
Marshall Road between Driveway 1 and Driveway 2	2,580	< 50	< 50	< 50	57.5	3,580	< 50	< 50	55	58.9	1.4
Marshall Road between Driveway 2 and Otis Avenue	3,010	< 50	< 50	< 50	58.1	3,770	< 50	< 50	57	59.1	1.0
Marshall Road between Otis Avenue and Golden Gate Drive	6,720	< 50	< 50	83	61.6	7,540	< 50	< 50	89	62.1	0.5
Marshall Road between Golden Gate Drive and Seymour Avenue	9,030	< 50	< 50	100	62.9	9,760	< 50	< 50	105	63.3	0.4
Marshall Road between Seymour Avenue and Rivermont Street-Allan Drive	8,415	< 50	< 50	96	62.6	9,145	< 50	< 50	101	63.0	0.4
Marshall Road between Rivermont Street-Allan Drive and Jefferson Boulevard	9,155	< 50	< 50	101	63.0	9,885	< 50	< 50	106	63.3	0.3
Southport Parkway north of Marshall Road	13,990	< 50	67	135	64.0	15,170	< 50	70	142	64.4	0.4
Southport Parkway south of Marshall Road	14,710	< 50	65	138	65.1	14,730	< 50	65	138	65.1	0.0
Otis Avenue between Marshall Road and Driveway 3	4,100	< 50	< 50	< 50	56.0	4,840	< 50	< 50	< 50	56.7	0.7
Otis Avenue between Driveway 3 and Driveway 4	4,100	< 50	< 50	< 50	56.0	4,640	< 50	< 50	< 50	56.6	0.6
Otis Avenue south of Driveway 4	4,100	< 50	< 50	< 50	56.0	4,440	< 50	< 50	< 50	56.4	0.4
Jefferson Boulevard north of Marshall Road	18,330	53	112	240	68.9	19,030	54	115	246	69.1	0.2
Jefferson Boulevard south of Marshall Road	13,270	< 50	90	194	67.5	13,300	< 50	91	194	67.5	0.0

Source: Compiled by LSA (2026).
ADT = average daily traffic
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibel
ft = foot/feet

On-Site Land Use Compatibility Impacts.

Exterior Noise. As shown in **Table 4.13.A**, the long-term noise measurements indicate that traffic noise levels would be approximately 64 dBA CNEL at residential units along Marshall Road and 63 dBA CNEL at units along Otis Avenue. The existing daily noise levels were adjusted to reflect cumulative with project conditions by adding 2 (rounded up from 1.3 dBA) dBA to the existing daily noise level based on the existing without traffic noise levels shown in **Table 4.13.I** and cumulative with project traffic noise levels shown in **Tables 4.13.J and 4.13.K.** The calculated cumulative with project daily noise levels along the northern, eastern, and western project boundaries would reach up to 66, 65, and 56 dBA CNEL, respectively.

Consistent with the Brar Farms Neighborhood Design Standards,[8] the proposed project would include the construction of community walls along the northern perimeter of the project site along Marshall Road, as well as along the eastern perimeter of the project site along Otis Avenue, to ensure that exterior traffic noise levels at the project site remain below the City's exterior noise standard of 60 dBA CNEL for residential uses. Based on the findings of this noise analysis, it was determined that a 6-foot-high wall along the eastern project boundary would provide a minimum noise reduction of 5 dBA, reducing exterior noise levels from 65 dBA CNEL to 60 dBA CNEL (65 dBA – 5 dBA = 60 dBA). Along the northern project boundary, a minimum wall height of 7 feet would be required to achieve a noise reduction of at least 6 dBA and reduce exterior noise levels from 66 dBA CNEL to 60 dBA CNEL (66 dBA – 6 dBA = 60 dBA). Furthermore, noise levels at the proposed viewing area on the edge of the detention basin within the seasonal recreational field would reach up to 66 dBA CNEL. This noise level would be below the City's exterior noise standard of 70 dBA CNEL for playground and neighborhood park uses.

Interior Noise. As discussed above, an interior noise level standard of 45 dBA CNEL or less is required for all noise-sensitive rooms. Based on the expected future exterior noise levels at the project site approaching 64 dBA CNEL, a minimum noise reduction 9 dBA would be required. The proposed project includes an HVAC system that would allow windows to remain closed. Based on reference information from transmission loss test reports for various Greenworld windows,[9] standard building construction along with standard windows, typically in the Sound Transmission Class (STC) 25–28 range, a reduction of 25 dBA or more would be achieved. With a reduction of 25 dBA or more, interior noise levels would remain below the interior noise level standard of 45 dBA CNEL.

Threshold 4.13.2: Would the project result in the generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. As described above in Section 4.13.2.3, Characteristics of Vibration, vibration refers to ground-borne noise and perceptible motion. Ground-borne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors. Vibration energy propagates from a source, through intervening soil and rock layers, to the foundations of

8 City of West Sacramento. 2025. *Brar Farms Neighborhood Design Standards.*

9 Greenworld Windows. 2018. *Various Transmission Loss Reports*.

nearby buildings. The vibration then propagates from the foundation throughout the remainder of the structure.

Typical sources of ground-borne vibration are construction activities (e.g., blasting, pile driving, and operating heavy-duty earthmoving equipment), steel-wheeled trains, and occasional traffic on rough roads. Problems with both ground-borne vibration and noise from these sources are usually localized to areas within approximately 100 feet of the vibration source, although there are examples of ground-borne vibration causing interference out to distances greater than 200 feet. When roadways are smooth, vibration from traffic, even heavy trucks, is rarely perceptible. It is assumed for most projects that the roadway surface will be smooth enough that ground-borne vibration from street traffic will not exceed the impact criteria; however, the construction of the project could result in ground-borne vibration that may be perceptible.

The roadways surrounding the project site, include Marshall Road and Otis Avenue which are paved, smooth, and unlikely to cause significant ground-borne vibration. In addition, the rubber tires and suspension systems of buses and other on-road vehicles make it unusual for on-road vehicles to cause ground-borne noise or vibration problems. It is, therefore, assumed that no such vehicular vibration impacts would occur and, therefore, no vibration impact analysis of on-road vehicles is necessary.

Construction Vibration Impacts. Construction of the proposed project could result in the generation of ground-borne vibration. This construction vibration impact analysis discusses the level of human annoyance using vibration levels in root mean square (RMS) (vibration velocity decibels or VdB) and assesses the potential for building damage using vibration levels in PPV (in/sec). This is because vibration levels calculated in RMS are best for characterizing human response to building vibration, while vibration levels calculated in PPV are best for characterizing potential for damage. **Table 4.13.L: Vibration Source Amplitudes for Construction Equipment** shows the PPV and VdB values at 25 feet from a construction vibration source. As also shown in **Table 4.13.L**, bulldozers and other heavy-tracked construction equipment, which are expected to be used for this project, generate approximately 0.089 in/sec PPV (87 VdB) and 0.076 in/sec PPV (86 VdB) of ground-borne vibration when measured at 25 feet, based on the FTA's 2018 *Transit Noise and Vibration Impact Assessment Manual* (FTA Manual). The distance to the nearest buildings for vibration impact analysis is measured between the nearest off-site buildings and the project construction boundary, assuming the construction equipment would be used at or near the project boundary.

Table 4.13.L: Vibration Source Amplitudes for Construction Equipment

Equipment	Reference PPV/L_V at 25 ft	
	PPV (in/sec)	L_V (VdB)[1]
Hoe Ram	0.089	87
Large Bulldozer	0.089	87
Caisson Drilling	0.089	87
Loaded Trucks	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

Source: *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018).
[1] RMS VdB re 1 µin/sec.
µin/sec = micro-inches per second
ft = foot/feet
FTA = Federal Transit Administration
in/sec = inches per second
L_V = velocity in decibels
PPV = peak particle velocity
RMS = root-mean-square
VdB = vibration velocity decibels

Table 4.13.M: Potential Construction Vibration Annoyance lists the projected vibration levels from various construction equipment expected to be used on the project site in the active construction area to the nearest buildings in the project vicinity. Vibration annoyance is evaluated using the average distance to the center of the site, while vibration damage is evaluated from the construction boundary because that reflects the proximity of the nearest structures. As shown below in **Table 4.13.M**, the closest residential building is approximately 800 feet south from the center of the project site and would experience a vibration level of up to 42 VdB. This vibration level would not have the potential to result in community annoyance because vibration levels would not exceed the City's and the FTA's annoyance thresholds of 65 VdB.

Table 4.13.M: Potential Construction Vibration Annoyance

Land Use	Direction	Equipment/ Activity	Reference Vibration Level at 25 ft (VdB)	Distance[1] (ft)	Vibration Level (VdB)
Residence	North	Large bulldozers	87	865	41
		Loaded trucks	86	865	40
Residence	East	Large bulldozers	87	890	40
		Loaded trucks	86	890	39
Residence	South	Large bulldozers	87	800	42
		Loaded trucks	86	800	41
Residence	West	Large bulldozers	87	955	40
		Loaded trucks	86	955	39

Source: Compiled by LSA (2026).
Note: The City of FTA annoyance threshold is 65 VdB for residences.
[1] Distance from the center of the project site to the building structure.
ft = foot/feet
FTA = Federal Transit Administration
VdB = vibration velocity decibels

Similarly, **Table 4.13.N**: **Potential Construction Vibration Damage** lists the projected vibration levels from various construction equipment expected to be used on the project site at the project construction boundary to the nearest buildings in the project vicinity. As shown in **Table 4.13.N,** the closest building is approximately 10 feet south from the project construction boundary and would experience a vibration level of up to 0.244 PPV in/sec. This vibration level would not result in building damage because the building is conservatively assumed to be an older residential structure or better, and the anticipated project-related vibration levels would not exceed the Caltrans' vibration damage threshold of 0.30 PPV in/sec. Other building structures that surround the project site would experience lower vibration levels because they are farther away and are also conservatively assumed to be an older residential structure or better, and the anticipated project-related vibration levels would not exceed the Caltrans' vibration damage threshold of 0.30 PPV in/sec. Therefore, impacts related potential for building damage would be less than significant, and no construction vibration impacts would occur.

Table 4.13.N: Potential Construction Vibration Damage

Land Use	Direction	Equipment/ Activity	Reference Vibration Level at 25 ft (in/sec [PPV])	Distance[1] (ft)	Vibration Level (in/sec [PPV])
Residence	North	Large bulldozers	0.089	65	0.031
		Loaded trucks	0.076	65	0.027
Residence	East	Large bulldozers	0.089	70	0.029
		Loaded trucks	0.076	70	0.024
Residence	South	Large bulldozers	0.089	10	0.244
		Loaded trucks	0.076	10	0.208
Residence	West	Large bulldozers	0.089	25	0.089
		Loaded trucks	0.076	25	0.076

Source: Compiled by LSA (2026).
Note: The Caltrans building damage threshold for older residential structures is 0.30 PPV (in/sec).
[1] Distance from the project construction boundary to the building structure.
Caltrans = California Department of Transportation
ft = foot/feet
in/sec = inches per second
PPV = peak particle velocity

Long-Term Ground-Borne Noise and Vibration impacts. The proposed project would not generate vibration levels related to on-site operations. Vibration levels generated from project-related traffic on the adjacent roadways (Marshall Road and other roadways in the project area) would be unusual for on-road vehicles because the rubber tires and suspension systems of on-road vehicles provide vibration isolation. Therefore, vibration levels generated from project-related operations would be **less than significant**.

Threshold 4.13.3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the Project area to excessive noise levels?

Less Than Significant Impact. As discussed above in Section 4.13.3.3 Existing Aircraft Noise Levels, the closest airport to the project site is approximately 4 miles northwest of Sacramento Executive Airport and approximately 10.4 miles south of Sacramento International Airport. The noise contour boundaries of the Sacramento Executive Airport show that the project site is located well outside of the 65 dBA CNEL contour line, therefore, this impact would be **less than significant**. No mitigation is required.

4.13.7 Cumulative Impacts

Less than Significant with Mitigation Incorporated. As defined in Section 15355 of the *State CEQA Guidelines*, cumulative impacts refer to the incremental effects of an individual project when viewed in connection with the effects of past projects, current projects, and probable future projects. The cumulative study area for noise and vibration is described in Chapter 4.0; the cumulative project list is provided in Chapter 4.0, **Table 4.A**, and a map of the cumulative project locations is provided in Chapter 4.0, **Figure 4-1**.

Construction Noise. Construction activities associated with the proposed project and other construction projects in the area may overlap, resulting in construction noise in the area. However, construction noise impacts primarily affect the areas immediately adjacent to each construction site. As described under Threshold 4.13.1, project Impacts, noise levels from project construction would be highest during site preparation and grading, reaching up to 64.6 dBA L_{eq} at the nearest sensitive receptors. This is below the 80 dBA L_{eq} threshold established by the FTA for residential uses, and construction activities would only occur between the hours of 7:00 a.m. and 7:00 p.m. Monday through Saturday, consistent with **Mitigation Measure NOI-1**. Cumulative development in the vicinity of the project site could result in elevated construction noise levels at sensitive receptors in the area surrounding the project site. However, as shown in **Figure 4-1**, none of the cumulative projects are located in close enough proximity to the project site for construction noise to overlap at the same receptors. Additionally, each cumulative project would be required to comply with the City's Municipal Code construction noise standards. Therefore, cumulative construction noise impacts would be **less than significant with mitigation incorporated.**

Operational Traffic Source Noise Impacts. According to USEPA, cumulative noise impacts represent the combined and incremental effects of human activities that accumulate over time. While the incremental impacts may be insignificant by themselves, the combined effect may result in a significant impact. Conversely, although there may be a significant noise increase due to proposed project in combination with other cumulative projects (combined effects), it must also be demonstrated that the project has an incremental effect. In other words, a significant portion of the noise increase must be due to the proposed project. As shown above in **Tables 4.13.L, 4.13.M, and 4.13.N,** project-related traffic noise increases would be very small, ranging from 0.0 to 2.0 dBA along the analyzed roadway segments, with the greatest increase of up to 2.0 dBA occurring along Marshall Road between Southport Parkway and Driveway 1 under cumulative (buildout) conditions without Enterprise Crossing (**Table 4.13.K**); increases of up to 1.8 dBA would occur along Otis Avenue between Marshall Road and Driveway 3 under existing conditions (**Table 4.13.L**); and increases of up to 0.9 dBA would occur along Marshall Road between Southport Parkway and Driveway 1 and Marshall Road between Driveway 1 and Driveway 2 under cumulative (buildout) conditions without Enterprise Crossing (**Table 4.13.K**). These levels are below the significance

criteria for off-site traffic noise. Therefore, none of the roadway segments in the vicinity of the project site would experience a substantial noise level increase greater than the applicable noise thresholds, and the proposed project would not have a cumulatively significant traffic noise impact. Accordingly, impacts would be **less than significant.**

Operational Stationary Source Noise. Long-term stationary noise sources associated with the development of the proposed project, combined with other cumulative projects, could cause local noise level increases. Noise levels associated with the proposed project and related projects together could result in higher noise levels than considered separately. As previously described, on-site noise sources associated with the proposed project would not exceed any applicable noise standards. Additionally, each of the cumulative projects would be required to comply with the City's noise level standards and include mitigation measures if standards are exceeded. Therefore, cumulative noise impacts from stationary noise sources would be **less than significant.**

Vibration. As shown in **Table 4.13.K** above, the closest residential building would experience vibration levels of up to 42 VdB, which is below the City's and FTA's annoyance threshold of 65 VdB. Additionally, as shown in **Table 4.13.I**, the closest structure to the construction boundary would experience vibration levels of up to 0.244 in/sec PPV, which is below the Caltrans structural damage threshold of 0.30 in/sec PPV. Because vibration is highly localized, cumulative impacts would only occur if two or more construction projects were operating within close proximity to the same receptor at the same time. As shown in **Figure 4-1**, none of the cumulative projects are located close enough to the proposed project site to result in overlapping vibration effects. In addition, the project would not result in long-term vibration impacts, and operational vibration from on-site activities or project-related vehicle trips would be negligible. Therefore, cumulative vibration impacts would be **less than significant**.

4.13.8 Level of Significance Prior to Mitigation

Prior to mitigation, construction of the proposed project would result in a potentially significant impact related construction noise.

4.13.9 Regulatory Compliance Measures and Mitigation Measures

4.13.9.1 Regulatory Compliance Measures

There are no regulatory compliance measures applicable to the proposed project pertaining to noise.

4.13.9.2 Mitigation Measures

The following mitigation measure is required to reduce potentially significant impacts related to construction noise to a less than significant level:

Mitigation Measure NOI-1

Construction Hours. The City of West Sacramento or construction contractor shall implement the following measures at the project site:

- Construction activities shall only occur between the hours of 7:00 a.m. and 7:00 p.m. on Monday through Saturday.
- No construction activity shall occur on Sundays or City-recognized holidays without a written exemption by the Chief Building Official or his/her designee.

4.13.10 Level of Significance after Mitigation

Potentially significant impacts would be reduced to a less than significant level after mitigation. Therefore, with implementation of **Mitigation Measure NOI-1**, the proposed project would not result in any significant impacts related to noise.

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4.14 POPULATION AND HOUSING

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for the proposed Brar Farms Residential Development Project (proposed project) to impact population and housing in the City of West Sacramento (City), using the Sacramento Area Council of Governments (SACOG) 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS);[1] the City's General Plan Housing Element;[2] and information from the United States Census Bureau.

4.14.1 Scoping Process

Several comments received during the scoping period addressed population and housing. These comments raised concerns about the project's contribution to population growth and its effects on City infrastructure.

4.14.2 Methodology

Evaluating the potential for project-related activities to impact the City's population and housing relied on data published by the California Economic Development Department (EDD), California Department of Finance (DOF), SACOG, the American Community Survey (ACS), and the United States (U.S.) Census Bureau, as well as information presented in the City's General Plan. Although SACOG has adopted the 2025 Blueprint to update regional growth projections through 2050, the Blueprint currently provides population forecasts only at the county level. City-specific population projections for West Sacramento are not included in the 2025 Blueprint. Accordingly, this analysis relies on the 2020 MTP/SCS Adopted Land Use Assumptions and the City's 2021–2029 Housing Element to characterize long-range population, housing, and employment trends in West Sacramento.

4.14.3 Existing Environmental Setting

4.14.3.1 Population, Housing, and Employment Trends in the City and County

West Sacramento is characterized by urban and agricultural areas, including single-family and multifamily residential uses, and concentrations of agricultural, commercial, office, industrial, and park and open space uses.

West Sacramento and Yolo County are located within the SACOG planning area, which encompasses a population of 2.5 million residents in an area of more than 6,000 square miles. SACOG is a federally designated Metropolitan Planning Organization (MPO)[3] encompassing six counties (El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba Counties) and various local jurisdictions. In 2019, the SACOG

1 Sacramento Area Council of Governments (SACOG). 2019. *2020 MTP/SCS Metropolitan Transportation Plan/Sustainable Communities Strategy Adopted*. November 18. Website: https://www.sacog.org/home/showpublisheddocument/76/638212804736270000 (accessed February 2026).

2 City of West Sacramento. 2021. *2021-2029 Housing Element Update, Table A-6.* Website: https://www.cityofwestsacramento.org/home/showpublisheddocument/12221/637619619413930000 (accessed February 2026).

3 An MPO is a federally mandated and federally funded transportation policymaking organization that is made up of representatives from local government and governmental transportation authorities. In 1962, the United States Congress passed legislation that required the formation of an MPO for any urbanized area with a population greater than 50,000.

board adopted the MTP/SCS to forecast how the Sacramento region will evolve over the next two decades. In 2022, the SACOG Board adopted the 2025 Blueprint growth projections for population, employment, and households in the region. Additionally, SACOG adopted the MTP/SCS to the Final 2025 Blueprint Plan, in November 2025.

The growth forecast for Yolo County and West Sacramento is provided in **Table 4.14.A: Population, Households, and Employment Forecasts for Yolo County (2020–2050)** and **Table 4.14.B: Population, Households, and Employment Forecasts for West Sacramento (2016–2040).** These projections are used as a reference point for discussing population and housing growth throughout this section.

Table 4.14.A: Population, Households, and Employment Forecasts for Yolo County (2020–2050)

Yolo County	2020 (Actual)	2035 (Estimate)	2050 (Estimate)	2020–2050 Increase	% Change 2020–2050
Population	218,271	248,541	288,657	70,386	32.2%
Households	80,060	94,820	107,480	27,420	34.3%
Employment	113,290	128,105	141,105	27,815	24.6 %

Sources: California Department of Finance. Demographic Research Unit. Report P-2A: Total Population Projections, California Counties, 2020-2070 (Baseline 2023 Population Projections; Vintage 2025 Release). Sacramento: California. April 2025;
2025 Blueprint (MTP/SCS) Adopted Land Use Assumptions. (SACOG 2024). Website: https://www.sacog.org/home/showpublished document/2432/638554228380389235 (accessed May 15, 2025).

Table 4.14.B: Population, Households, and Employment Forecasts for West Sacramento (2020–2040)

City of West Sacramento	2020 (Actual)	2040 (Estimate)	% Change 2020–2040
Population	55,926	87,999	57%
Households	20,420	36,130	77%
Employment	37,470	49,740	33%

Sources: City of West Sacramento. 2021. *2021-2029 Housing Element Update.* July 2021;
Sacramento Area Council of Governments (SACOG). 2025. *Blueprint Draft Program EIR.*

Population. As shown in **Table 4.14.A**, according to the 2020 MTP/SCS Adopted Land Use Assumptions,[4] Yolo County's population is anticipated to grow by approximately 32.2 percent between 2020 and 2050, increasing from approximately 218,271 people to 288,657 people.

Households. As shown in **Table 4.14.B**, the number of households in West Sacramento is projected to increase by 77 percent between 2020 and 2040. In comparison, Yolo County's households are anticipated to increase by 34.3 percent between 2020 and 2050 (**Table 4.14.A**). These projections

[4] Sacramento Area Council of Governments (SACOG). 2022. *2025 Blueprint (MTP/SCS) Adopted Land Use Assumptions.* Website: https://www.sacog.org/home/showpublisheddocument/2432/638554228380389235 (accessed February 2026).

indicate steady household growth in both West Sacramento and Yolo County over the planning horizon.

Employment. As shown in **Table 4.14.B**, employment in West Sacramento is anticipated to grow by approximately 33 percent between 2020 and 2040. Employment in Yolo County is expected to grow by 24.6 percent between 2020 and 2050, suggesting that employment will increase steadily in both West Sacramento and Yolo County.

Additionally, according to the EDD, as of April 2024, West Sacramento had a labor force of 29,400 and Yolo County had a labor force of 112,800 with approximately 1,300 and 5,900 people unemployed, respectively.[5] The April 2024 unemployment rate was 4.4 percent for West Sacramento and 5.2 percent for Yolo County.

4.14.3.2 Age Characteristics

A city's age distribution often shapes its housing demand, because different age groups prefer different types of housing. **Table 4.14.C: West Sacramento and Yolo County Age Characteristics** below provides a comparison of West Sacramento's and Yolo's populations by age group using data from the 2023 ACS 5-year estimate. According to the ACS data, the City's median age is 34.6 years, which is slightly higher than the County's median age (32.3 years), indicating that the population of West Sacramento is slightly older overall than that of Yolo County.[6]

Table 4.14.C: West Sacramento and Yolo County Age Characteristics

Age Group	West Sacramento		Yolo County	
	Persons	Percentage	Persons	Percentage
Under 5 Years	3,419	6.30%	10,781	5.00%
Under 18 Years	13,926	25.60%	44,638	20.50%
18 to 24 Years	5,702	10.50%	42,865	19.70%
25 to 44 Years	16,401	30.10%	55,966	25.70%
45 to 64 Years	12,477	22.90%	45,398	20.85%
65 and Over	5,990	11.00%	28,915	13.30%
Total	**54,496**	**100.0%**	**217,782**	**100.0%**
Median Age	34.6		32.3	

Source: American Community Survey 2023 5-Year Estimates, Table S0101 (United States Census Bureau 2023). Website: https://data.census.gov/table/ACSST5Y2023.S0101?g=050XX00US06113_160XX00US0684816 (accessed June 11, 2025).

[5] California Employment Development Department. 2024. Monthly Labor Force Data for Cities and Census Designated Places, Yolo County, April. Website: https://view.officeapps.live.com/op/view. aspx?src=https%3A%2F%2Flabormarketinfo.edd.ca.gov%2Ffile%2Flfmonth%2Fyolosub.xls&wdOrigin=BROWSELINK (accessed February 2026).

[6] United States Census Bureau. 2023. *American Community Survey 2023 5-Year Estimates,* Table S0101 Website: https://data.census.gov/table/ACSST5Y2023.S0101?g=050XX00US06113_160XX00US0684816&moe=false (accessed February 2026).

4.14.4 Regulatory Setting

Federal, State, and local regulations and programs related to population and housing that are applicable to the proposed project are described below.

4.14.4.1 Federal Regulations

There are no federal regulations that apply to the proposed project with respect to population and housing.

4.14.4.2 State Regulations

Regional Housing Needs Plan. California's General Plan law requires each city and county to have land zoned to accommodate a fair share of the regional housing need. The share is known as the regional housing need allocation (RHNA) and is based on a Regional Housing Needs Plan (RHNP) developed by councils of government. The State-mandated RHNA process (Government Code Sections 65580 et seq.) requires SACOG to develop a methodology that determines how to divide and distribute the overall allocation that the region receives from the State.

Senate Bill 330. California Senate Bill (SB) 330, "The Housing Crisis Act of 2019," was signed into law by Governor Newsom on October 9, 2019, and became effective January 1, 2020. The bill establishes a Statewide housing emergency to be in effect until January 1, 2030 (extended from the original sunset date of January 1, 2025). During the housing emergency period, cities and localities in urban areas, including the City of West Sacramento, are generally prohibited from rezoning actions or imposing new development standards that would reduce the zoned capacity for housing or adopting new design standards that are not objective. In such jurisdictions, the demolition of existing housing units is only permitted if replacement units are provided. The demolition of existing low-income units is only permitted if certain conditions related to affordability and tenant protections are met.

4.14.4.3 Regional Regulations

Sacramento Area Council of Governments (SACOG). As the designated MPO for the six-county 22-city Sacramento metropolitan region, SACOG prepares several plans to address regional growth, including the MTP/SCS. SACOG is mandated by federal and State law to research and draw up plans for transportation, growth management, hazardous waste management, and a regional growth forecast that is the foundation for these plans and regional air quality plans. These include the Regional Comprehensive Plan and Guide, RHNA, the MTP, the Regional Transportation Improvement Program (RTIP), and the annual State of the Region reports to measure progress toward achieving regional planning goals and policies.

Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). The 2025 MTP/SCS is a long-range plan for transportation improvements in the region. The 2025 MTP/SCS is based on projections for growth in population, housing, and jobs. SACOG determines the regional growth projections by evaluating baseline data, historic reference data, capacity data, and current MTP data about assumptions used in the most recent MTP/SCS. Baseline data includes existing housing units and employees, the jobs-to-housing ratio, and the percent of regional growth share for housing units and employees. The historic reference data is based upon five- and ten-year residential building permit averages and historic county-level employment statistics. The capacity data includes

the General Plan data for each jurisdiction. SACOG staff meets with each jurisdiction to discuss and incorporate more subjective considerations about planned growth for each area. Finally, SACOG makes a regional growth forecast for new homes and new jobs, based upon an economic analysis provided by a recognized expert in order to estimate regional growth potential based on market analysis and related economic data. The growth forecast is then incorporated into the MTP/SCS.

4.14.4.4 Local Regulations

City of West Sacramento Housing Element. The Housing Element of the City of West Sacramento General Plan 2035 contains the following applicable goals and policies related to population and housing:

- **Goal HE-1:** Adequate land for a balanced range of housing (encompass Government Code Sections 65583). To designate adequate land for the production of a balanced range of housing types and densities that meet the needs of all economic segments and special housing needs of the community while emphasizing high quality development and encouraging homeownership when finically feasible.
    - **Policy HE-P-1.2:** The City will maintain an adequate supply of residential land in appropriate land use designations and zoning categories to accommodate the City's regional housing allocation under the Sacramento Area Council of Governments (SACOG) Regional Housing Needs Plan.
    - **Policy HE-P-1.3:** While promoting the provision of housing for all economic segments of the community, the City will seek to ensure high quality in all new residential developments.
- **Goal HE-3:** Community Health, Energy, Conservation and Sustainability. To support the City's Healthy communities program objectives, increase resilience to climate change, and promote sustainability in new and existing neighborhoods.

  Policy HE-P-3.1: The City will continue to encourage and provide incentives for: (1) Energy conservation features in residential construction that comply with, or exceed, state building standards; and (2) Design of new residential development using the latest energy efficiency technology.
- **Goal HE-5:** Adequate services for residential development. To ensure the provision of adequate services to support existing and future residential development.
    - **Policy HE-P-5.2:** The City will apply for state and federal funds, when available and feasible, for the upgrading of streets, sidewalks, and other public improvements.
    - **Policy HE-P-5.3:** The City will ensure that residential developments pay their proportional share of the cost of public facilities and services needed by those developments.

- **Policy HE-P-5.4:** The City will ensure that public facilities and services (e.g., water, sewer, and emergency services) are available prior to occupancy of residential projects.
- **Policy HE-P-5.5:** The City will promote infill residential and mixed-use development where adequate public facilities and services are already in place or proposed as part of the development.

Southport Framework Plan. The Southport Framework Plan (1995) covers the southern half of West Sacramento and establishes a foundation for a village-oriented, mixed-use development pattern with distinctive cores including schools, recreation, commercial services, and high-density residential development. Under the plan, Southport is anticipated to house a population of 42,344 at full buildout.

4.14.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the proposed project would have a significant adverse impact with respect to population and housing if it would:

Threshold 4.14.1: Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure); or

Threshold 4.14.2: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

4.14.6 Project Impacts

Potential impacts to population and housing are discussed below.

Threshold 4.14.1: Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. Growth can be induced in a number of ways, including through the elimination of obstacles to growth or through the stimulation of economic activity within the region. Examples of projects likely to have growth-inducing impacts include extensions or expansions of infrastructure systems beyond what is needed to serve project-specific demand, and development of new residential subdivisions or office complexes in areas that are currently only sparsely developed or are undeveloped.

The proposed project involves the subdivision of an approximately 60-acre property to create 259 lots for future single-family homes, comprising approximately 34.78 acres of residential development and 15 open space lots totaling 6.65 acres. The open space lots would include a 0.68-acre Central Park, a 0.14-acre parklet at the corner of Marshall Road and Otis Avenue, and 1.81 acres of landscaped lots, including a roundabout, distributed throughout the proposed development to provide greenspace and buffers. Additionally, the open space areas would include a 4.02-acre

detention basin, which would also serve as a recreational field during dry seasons. Landscaping, roadway, and utility improvements would also be installed within the project site. According to the City's 2021-2029 Housing Element Update,[7] the estimated amount of people per household in West Sacramento is approximately 2.8 people. Assuming a 2.8 people per household ratio, the proposed project would result in a net increase of approximately 725 persons upon development of the proposed project.[8]

As shown above in **Table 4.14.B**, the City Housing Element estimates that the city will grow to 87,999 residents by 2040, an increase of 65 percent from 2016. The rate of growth in West Sacramento is projected to be higher than Yolo County as a whole, at 32.2 percent for the same period. Correspondingly, the number of households is also projected to increase by 84 percent in the city and 34.3 percent in the county overall.

On March 19, 2020, the SACOG Board of Directors adopted the Cycle 6 (2021 to 2029) Regional Housing Needs Plan which provides the number of total housing units that each jurisdiction in the SACOG region must zone for during the Cycle 6 to 8-year period. According to the adopted RHNA methodology, West Sacramento's housing need allocation for the planning period between 2021 and 2029 is 9,471 units (2,287 very low-income units, 1,378 low-income units, 1,722 moderate-income units, and 4,084 above moderate income units).[9] As of the end of 2025, a total of 1,679 units have been created (7 extremely low-income units, 11 very low-income units, 54 low-income units, 36 moderate-income units, and 1,578 above moderate-income units).[10] The total RHNA for the City of West Sacramento would be less than the projected housing growth included in the 2020 MTP/SCS Preferred Growth Scenario that indicates the City's housing is projected to increase by 16,400 units from 2016 to 2045.[11] The 725 new additional residents generated by the proposed project would represent approximately 0.8 percent of the projected 2040 population[12] and approximately, 0.7 percent of the 2040 projected households.[13] This represents a fraction of the anticipated growth in the City's population for 2040.

In addition, according to the City's 2021-2029 Housing Element Update,[14] West Sacramento contained 20,049 housing units in 2019, reflecting a 7-percent increase (1,368 units) since 2010. Between 2010 and 2019, single-family detached homes experienced the largest growth, increasing by 714 units, while multifamily buildings with five or more units increased by 634 units, representing

7 City of West Sacramento. 2021. *2021-2029 Housing Element Update*. July.

8 259 households x 2.8 persons per household = 725 persons

9 Sacramento Area Council of Governments (SACOG). 2020. *SACOG Regional Housing Needs Plan. Cycle 6 (2021-2029) Adopted March 2020.* Website: https://www.sacog.org/home/showpublisheddocument/370/638218262676300000 (accessed February 2026).

10 City of West Sacramento. 2026. Personal communication with City staff.

11 Sacramento Area Council of Governments (SACOG). 2022. *2025 Blueprint (MTP/SCS)* Appendix C – *Land Use Forecast.* Website: https://www.sacog.org/home/showpublisheddocument/38/638212803200970000 (accessed February 2026).

12 (725 persons from the proposed project / 87,999 2040 projected population) x 100 = 0.8 percent of total 2040 population

13 (259 new housing units from the proposed project / 35,063 total projected household growth) × 100 = 0.7 percent of total projected household growth

14 City of West Sacramento. 2021. *2021-2029 Housing Element Update*. July.

a 20-percent increase. During the 2021 to 2029 Housing Element planning period, the City will also coordinate with housing developers under its inclusionary housing program and Affordable Housing Agreements, which has provided 1,590 affordable units since 1990 through acquisition, new construction, and rehabilitation. While the proposed project would not include affordable housing, the addition of 725 new single-family detached units would contribute to the City's overall housing inventory and support the City in accommodating its assigned housing need allocation of 9,471 units for the 2021–2029 planning period. Additionally, the project will be required to pay an in-lieu fee which will support additional affordable housing production.

The project site is currently characterized by lower-density zoning districts and land use designations. The areas within the Southport Framework Plan have been developed using a less intensive development pattern to avoid suburban sprawl. As discussed in Chapter 3.0, Project Description, the project site is currently designated as Rural Estate (RE) in both the City's General Plan and the Southport Framework Plan. The RE land use designation is intended for the development of single-family detached homes, secondary residential units, limited agricultural uses, public and quasi-public uses, and similar and compatible uses in a rural setting. The RE land use designation allows a maximum residential density of one dwelling unit for every 2.5 acres.[15] The project site is currently zoned as Residential Rural Estates (RE), which is intended to provide for residential development on large lots within rural residential areas.

As a result of the proposed project, a General Plan Amendment (GPA) to the City's existing General Plan and an amendment to the Southport Framework Plan to change the designations from RE to Low Density Residential (LR) would be required. The proposed project would also require a Zoning Map/Code Amendment to rezone the site from RE to Residential One Family (R-1-A). According to the City's General Plan, the LR designation is intended to provide single-family detached and attached homes, secondary residential units, public and quasi-public uses, and similar compatible uses, allowing a maximum residential density of 6.0 dwelling units per acre (DUA). Additionally, the City's Zoning Code designates the R-1-A zoning district for single-unit dwellings while preserving the characteristics of existing single-unit neighborhoods. The R-1-A zoning district also permits public and quasi-public uses, as well as other compatible uses suited for a low-density residential environment, with allowed residential densities ranging from 1.1 to 6.0 DUA.

Upon approval of the proposed project, the project site would allow for higher residential densities and would be developed at an overall density of approximately 4.3 DUA. Accordingly, approval of the proposed project could encourage similar future General Plan amendments and up-zoning on adjacent or nearby parcels, which could contribute to long-term development pressure and potential densification within the Southport Rural Core. However, any future development proposals, including proposals to up-zone parcels within the Southport Rural Core would require separate discretionary approvals by the City and would be subject to project-specific environmental review pursuant to CEQA. Such review would evaluate the potential for growth-inducing impacts and consistency with applicable plans. In addition, the proposed project includes only residential and park/open space uses on site. Commercial, industrial, or other uses that might result in increased employment opportunities in the City are not included in the proposed project. Therefore, the

[15] City of West Sacramento. 2016. *City of West Sacramento General Plan 2035 Policy Document.* November. Updated January 2024.

proposed project would not induce substantial unplanned population growth related to the introduction of new businesses to West Sacramento.

The proposed project would include development of several public streets to facilitate circulation throughout the proposed residential development. In addition, infrastructure (e.g., water facilities, sewer facilities, and energy services) would be extended throughout the project site. However, these roadway and infrastructure improvements are intended to serve the proposed project's residents and would not provide additional infrastructure capacity for other projects. A single-lane roundabout at the intersection of Marshall Road and Otis Avenue adjacent to the northeastern corner of the project site would also be developed. The primary purpose of this facility is to control existing and project-related traffic along Marshall Road and Otis Avenue. Accordingly, these improvements would not indirectly induce additional population growth beyond what is planned. Therefore, the development of the proposed project would not indirectly induce substantial population growth, and indirect impacts would be **less than significant**. No mitigation is required.

Threshold 4.14.2: Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. As stated above under Threshold, 4.14.1, the proposed project would include the development of a 60-acre subdivision consisting of 259 lots for future development of single-family homes, as well as 15 open space lots consisting of a 0.68-acre Central Park, a 0.14-acre parklet at the corner of Marshall Road and Otis Avenue, and 1.81 acres of landscaped lots, including a roundabout, distributed throughout the proposed development to provide greenspace and buffers. Associated landscaping, roadway, and utility improvements would also be installed throughout the project site. The project site is currently undeveloped and the proposed project would not result in displacement of existing people or housing necessitating the construction of replacement housing elsewhere. Rather, the proposed project would contribute to the City's housing needs. Therefore, **no impact** would occur.

4.14.7 Cumulative Impacts

Less Than Significant Impact. As defined in Section 15355(b) of the *State CEQA Guidelines*, cumulative impacts refer to the incremental impacts of the project added to other closely related past, present, and reasonably foreseeable probable future projects. The cumulative study area for population and housing is described in Chapter 4.0; the cumulative project list is provided in **Table 4.A**, in Chapter 4.0 Existing Setting, Environmental Analysis, Impacts, and Mitigation Measures, and a map of the cumulative project locations is provided in Chapter 4.0, **Figure 4-1**.

Implementation of the proposed project in conjunction with the 26 cumulative projects identified in **Table 4.A**, would contribute to an increase in population and housing growth in the City of West Sacramento. As such, upon full buildout of the 26 cumulative projects, it is estimated that this would result in an additional 11,109 residential units within the City. According to the City's 2021–2029 Housing Element Update, the average household size in West Sacramento is 2.8 persons. The combined construction of the related residential units would generate a total of approximately 31,105 new residents within West Sacramento. Construction of the proposed project in addition to the 26 cumulative projects would result in a cumulative population increase of approximately 31,830

new residents within the City.[16] Although the addition of 31,830 new residents would represent approximately 92 percent of the forecasted City population increase of 34,604 residents between 2016 and 2040, as shown in **Table 4.14.B**, this growth is consistent with the regional growth forecast in the SACOG MTP/SCS and directly supports the City's General Plan Housing Element goals.

Additionally, as discussed above, according to the RHNA methodology adopted on March 19, 2020, the City of West Sacramento has a total estimated RHNA of 9,471 units. Implementation of the proposed project, together with the 26 related cumulative projects identified in **Table 4.A**, would result in the development of approximately 11,368 additional total housing units. This total includes both the proposed project and cumulative projects and would represent approximately 120 percent of the City's overall RHNA allocation.

As also discussed above, approval of the proposed project could increase the likelihood of similar future amendments and up-zoning on adjacent or nearby parcels, which could contribute to long-term development pressure and potential densification within the Southport Rural Core. Additionally, some of the 26 cumulative projects identified in **Table 4.A** would also involve similar up-zoning actions, which could further increase opportunities for higher-density development in areas currently designated for lower-density uses. Although up-zoning increases the potential for densification in the Southport Rural Core, the combined population and housing growth is consistent with the regional growth forecast in the SACOG MTP/SCS and directly supports the City's General Plan Housing Element goals. Furthermore, any future proposals to up-zone or intensify development within the Southport Rural Core would require separate discretionary approvals by the City and would be subject to project-specific environmental review pursuant to CEQA. Such review would evaluate growth-inducing impacts and consistency with applicable plans.

Additionally, while some of the cumulative projects may include the installation or extension of roads or infrastructure, it is expected that those infrastructure improvements would only serve the applicable cumulative projects. Therefore, it is not anticipated that the cumulative projects would extend roads or other infrastructure into previously undeveloped areas in a manner that would induce unplanned growth, particularly given that the project area is highly urbanized and largely built out. As such, the proposed project in combination with the aforementioned cumulative projects would not result in a significant impact on population and housing because the increase in population would be consistent with planned, forecasted growth in both the City's Housing Element and the SACOG MTP/SCS. Therefore, the cumulative impact of the proposed project on population growth would be **less than significant**.

4.14.8 Level of Significance Prior to Mitigation

The proposed project would result in less than significant impact related to population and housing.

[16] (259 total housing units from the proposed project + 11,109 total housing units from the 26 cumulative projects = 11,368 total housing units) 11,368 × 2.8 average household size = 31,830 new residents

4.14.9 Regulatory Compliance Measures and Mitigation Measures

4.14.9.1 Regulatory Compliance Measures

There are no regulatory compliance measures applicable to the proposed project pertaining to population and housing.

4.14.9.2 Mitigation Measures

The proposed project would not result in significant impacts related to population and housing, and no mitigation is required.

4.14.10 Level of Significance after Mitigation

The proposed project would result in less than significant impacts related to population and housing.

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4.15 PUBLIC SERVICES

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for the proposed Brar Farms Residential Development Project (proposed project) to impact public services in the City of West Sacramento (City) from implementation of the proposed project using the City's General Plan Public Facilities and Services Element and the Draft EIR for the City's General Plan Update.

This section addresses the following public services (service providers are noted in parenthesis):

- Fire Protection (West Sacramento Fire Department [WSFD])
- Police Protection (West Sacramento Police Department [WSPD])
- Public Schools (Washington Unified School District [WUSD])
- Parks (City of West Sacramento Parks and Recreation)
- Public Libraries (Yolo County Library)

4.15.1 Scoping Process

Several comments received during the scoping period addressed public services. These comments raised concerns about increased response times, limited police and fire staffing, school overcrowding, and cumulative strain on community programs and emergency services.

4.15.2 Methodology

Project impacts on public services were based primarily on information obtained from agency websites, including the WSFD, the WSPD, the United States Census Bureau, the National Center for Education Statistics, the WUSD, and the Yolo County Library, and from the City's General Plan 2035 and the City's General Plan Update EIR.

4.15.3 Existing Environmental Setting

4.15.3.1 Fire Protection and Emergency Services

The WSFD is a municipal "all-hazard" response agency that provides fire protection, emergency medical services, hazardous materials response, technical rescue, and public education to the City of West Sacramento and surrounding areas. WSFD serves the population of West Sacramento, as well as areas beyond the city limits south to Babel Slough Road and west to Jefferson Boulevard. Areas north of the city are served by the Elkhorn Fire Protection District (EFPD). The WSFD maintains automatic and mutual aid agreements with neighboring fire departments, including those in the communities of Sacramento, Davis (including the University of California, Davis), Woodland, and Clarksburg, to ensure regional coordination and mutual support.

WSFD is organized into three primary divisions: Fire Administration, Emergency Operations, and Community Risk Reduction (HazMat/Fire Prevention). The Emergency Operations Division includes 75 full-time personnel, with 68 sworn personnel and seven civilian staff, operating on three rotating 48-hour shifts. Each shift includes 20 firefighters and a Battalion Chief. The department operates five fire stations, each staffed 24 hours a day, seven days a week:

- Fire Station 41 – 132 15th Street
- Fire Station 42 – 3585 Jefferson Boulevard
- Fire Station 43 – 1561 Harbor Boulevard
- Fire Station 44 – 905 Fremont Boulevard
- Fire Station 45 – 2040 Lake Washington Boulevard

The city is divided into five fire districts, each assigned to a fire station. The project site is located within Fire District 42 and is primarily served by Fire Station 42, located approximately 0.70 mile east of the site. A secondary response may be provided by Fire Stations 41 or 45, depending on unit availability and call volume.[1] WSFD responded to 11,810 calls for service in 2024, with the majority being emergency medical services; the average response time for these incidents was approximately 5 minutes 12 seconds. Additionally, as part of the Yarbrough Master Plan project, an adjacent cumulative project south of the project site, the existing Fire Station 42 at 3585 Jefferson Boulevard is anticipated to be relocated in accordance with the Yarbrough Comprehensive Development Phasing Plan, Comprehensive Financing Agreement, and Southport Fire Response Study. The timing of construction for Fire Station 42 would be identified in the Yarbrough Comprehensive Phasing Agreement and is expected to occur in coordination with development of the Yarbrough project.[2]

4.15.3.2 Police Protection

The WSPD provides police protection services to the project site and the greater West Sacramento community. The department comprises six divisions: Patrol, Investigations, Field Support, Professional Standards, Community Outreach and Support, and Administrative Support. In 2023, the WSPD served a population of approximately 55,000 residents across 23.3 square miles and was staffed with 53 sworn officers and 32 professional staff,[3] resulting in an officer-to-resident ratio of 0.96 officers per 1,000 residents.[4] Based on the most recent population estimates from the United States Census population estimates, in 2025 the City's population was estimated at approximately 56,216 residents.[5] Assuming a staff of 64 actual sworn officers and 33 professional staff, the officer-to-resident ratio in 2025 would increase slightly to 1.1 officers per 1,000 residents.[6] Please refer to **Table 4.15.A: WSPD Staffing**, which provides police staffing allocations. Although the City does not have a threshold for police staffing rations, the officer-to-resident ratio increases from 0.96 officers per 1,000 residents in 2023 to 1.1 officers per 1,000 residents in 2025, indicating that available law enforcement resources are currently sufficient to meet existing service demands.

1 City of West Sacramento. 2024. *West Sacramento Fire Department Annual Report 2024*. Website: https://www.cityofwestsacramento.org/home/showpublisheddocument/20443/638822029379800000 (accessed February 2026).

2 City of West Sacramento. n.d. *Yarbrough Master Plan. Amended and Restated Development Agreement*. Website: https://www.cityofwestsacramento.org/government/departments/community-development/planning-division/major-planning-projects/yarbrough-master-plan (accessed February 2026).

3 City of West Sacramento. 2023. *Police Divisions and Units*. Website: https://www.cityofwestsacramento.org/government/departments/police/police-divisions-and-units (accessed February 2026).

4 (53 sworn officers/55,000 residents) × 1000 = 0.96 officer-to-resident ratio

5 United States Census Bureau. 2025. *QuickFacts: West Sacramento City, California*. Website: https://www.census.gov/quickfacts/westsacramentocitycalifornia (accessed July 16, 2026).

6 (64 actual sworn officers/ 56,216 residents) x 1000 = 1.1 officer-to-resident ratio

Table 4.15.A: WSPD Staffing

WSPD Staff	2023	2024	2025
Allocated Sworn Staff	72	72	77/85[1]
Allocated Professional Staff	35	35	41
Actual (Year Average) Sworn Staff	53	52	64
Actual (Year Average) Professional Staff	32	31	33

Source: City of West Sacramento. 2026.
WSPD = West Sacramento Police Department
[1] This total represents pre- and post-Measure O staffing rates for WSPD.

The Patrol Division is the frontline of the department; it operates 24/7 and includes patrol officers, reserve peace officers, community service officers, and specialized units such as the boat and bicycle teams; officers are assigned to one of three geographic beats and respond to emergency and non-emergency calls, traffic incidents, and community concerns; the division is structured with two lieutenants and eight sergeants overseeing six patrol teams. The Investigations Division handles follow-up investigations for a wide range of crimes including violent offenses, property crimes, economic crimes, auto theft, and domestic violence; it includes general investigations, special investigations, crime scene investigations, and the records section; the division is staffed by a supervising sergeant, seven detectives, and two crime scene investigators. The Field Support Division manages traffic enforcement, special events, drone operations, and explosive ordnance disposal; it also oversees the property and evidence room, ensuring proper handling and storage of evidence for court proceedings; the division includes a lieutenant, traffic officers, and two property/evidence technicians. The Professional Standards Division is responsible for internal affairs investigations, use of force reviews, and officer training; it ensures accountability and compliance with departmental policies and procedures; the division is staffed by a professional standards sergeant and training personnel. The Community Outreach and Support Division focuses on non-enforcement responses to individuals in crisis, including those experiencing homelessness, mental illness, or substance use disorders; it operates under a co-responder model and includes positions such as a division manager, homeless outreach staff, and crisis intervention personnel; the division also leads youth and community engagement programs. The Administrative Support Division oversees internal operations such as finance, human resources, and Commission on Accreditation for Law Enforcement Agencies, Inc. (CALEA) accreditation; it ensures the department meets national standards for law enforcement practices and maintains transparency and accountability; the division includes administrative analysts, support staff, and accreditation coordinators.

WSPD measures response times using five dispatch priority levels, ranging from Priority 1 (life-threatening emergencies) to Priority 5 (non-emergency incidents); the higher the priority, the faster officers are expected to respond. Police services are dispatched from the department's headquarters at 550 Jefferson Boulevard, located approximately 4.25 miles northeast of the project site. The Patrol Division serves as the department's front line, operating 24 hours a day, seven days a week, and is responsible for responding to both emergency and non-emergency calls, traffic collisions, and other service requests. Patrol officers are assigned to one of three geographic beats; the project site is located within Beat 3, which covers the southern portion of the city. Officers assigned to this beat are responsible for patrolling the area, including the project site, and responding to calls within its

boundaries. The division is structured with two lieutenants and eight sergeants who supervise six patrol teams, each composed of up to six officers per shift.

In addition, the City has partnered with Measures for Justice, an organization which provides information on the City's police response times and additional call data. Based on this information, the City's overall median response time in 2025 is 11 minutes. The City has also adopted a goal of maintaining or reducing the 10.9-minute call-to-arrival time for community-generated calls through March 2026, as staffing and resource levels change.[7]

4.15.3.3 Public Schools

The proposed project is located within the WUSD, which currently operates a total of 11 schools, consisting of four K–8 elementary schools, three "transitional kindergarten" (TK)–8 elementary schools, , one comprehensive high school, and three other schools and or specialized programs. Current enrollment for each school campus within the district for the 2024–2025 school year is shown in **Table 4.15.B: City of West Sacramento Current WUSD Enrollment**.

Table 4.15.B: City of West Sacramento Current WUSD Enrollment

School	Grade Range	Current Enrollment (2024-2025)
Elementary Schools		
Bridgeway Island Elementary	K–8	1,062
Elkhorn Village Elementary	K–8	557
Riverbank Elementary	K–8	599
Southport Elementary	TK–8	785
Stonegate Elementary	TK–8	928
Westfield Village Elementary	TK–8	515
New Westmore Oaks Elementary	K–8	531
Westfield Village Elem		515
Total Elementary Schools		**4,977**
High Schools		
River City High School	9–12	2,168
Total High Schools		**2,168**
Other Schools		
Yolo High School	Continuation School	75
Washington Middle College High	9–12	171
Washington Unified Virtual Academy (WUVA)	N/A	57
Total Other Schools		**303**
Total WUSD		
Total WUSD	**All grades**	**7,448**

Source: Washington Unified School District. 2026. 2026 Supplemental FMP for the Purposes of Meeting Proposition 2 requirements. (Website: https://simbli.eboardsolutions.com/Meetings/Attachment.aspx?S=36030796&AID= 1415715&MID=48936, accessed March 13, 2026).

[7] Measures for Justice. 2026. Policy Goal. Website: https://commons.measuresforjustice.org/law-enforcement/west-sacramento-ca/goals (accessed June 11, 2026).

As shown in **Table 4.15.C: City of West Sacramento WUSD Historic Enrollment Trends**, over the past ten years WUSD has seen a total enrollment of 7,529 students during the 2015 through 2016 school year and a total enrollment of 7,448 students for the 2024 to 2025 school year.[8] As detailed in the **Table 4.15.B**, total enrollment within the district has declined by a total of 81 students, representing a decrease of 1.09 percent.

Table 4.15.C: City of West Sacramento Historic WUSD Enrollment Trends

School	Grade Range	Past Enrollment (2015-2016)	Current Enrollment (2024-2025)	Percent Change (2015-2025)
WUSD				
WUSD	All grades	7,529	7,448	(1.09)

Source: Washington Unified School District. 2026. 2026 Supplemental FMP for the Purposes of Meeting Proposition 2 Requirements. Website: https://simbli.eboardsolutions.com/Meetings/Attachment.aspx?S=36030796&AID=1415715&MID=48936 (accessed March 13, 2026).
Note: Percent change values shown in parentheses indicate a negative trend (i.e., a decrease in enrollment).

As shown below, **Table 4.15.D: City of West Sacramento WUSD Existing Classroom Capacity** details the existing classroom capacity, current utilization, and projected utilization for schools within WUSD. As detailed in **Table 4.15.D**, the district currently maintains a total net classroom capacity of approximately 9,991 students across all school campuses with a districtwide utilization of approximately 68.2 percent based on current enrollment levels for the 2024 to 2025 school year.

In addition, future enrollment projections prepared by the WUSD shown in **Table 4.15.E: City of West Sacramento WUSD Five-Year Public School Enrollment Projections**. According to **Table 4.15.E**, total district enrollment for the 2025–2026 school year is expected to be approximately 7,498 students. Projected enrollment is anticipated to decline by approximately 81 students, to about 7,367 students, by the 2030–2031 school year. However, based on current enrollment trends from the 2024–2025 school year, WUSD is projected to experience an approximately 0.67 percent increase (50 students) for the 2025–2026 school year.

[8] Washington Unified School District (WUSD). 2026. *2026 Supplemental FMP for the Purposes of Meeting Proposition 2 requirements.* Website: https://simbli.eboardsolutions.com/Meetings/Attachment.aspx?S=36030796&AID=1415715&MID=48936 (accessed March 13, 2026).

Table 4.15.D: City of West Sacramento WUSD Existing Classroom Capacity

School	Net Classroom Capacity	Current Enrollment (2024-2025)	Future Enrollment (2026-2027)	Future Enrollment (2030-2031)	2024-2025 Utilization (Percent)	2030-2031 Projected Utilization (Percent)
Elementary School Totals						
Bridgeway Island Elementary	1,169	1,062	998	911	90.8	77.9
Elkhorn Village Elementary	860	557	534	490	64.8	57.0
Riverbank Elementary	870	599	583	489	68.9	56.2
Southport Elementary	937	785	780	682	83.8	72.8
Stonegate Elementary	1,091	928	951	932	85.1	85.4
Westfield Village Elementary	801	515	514	463	64.3	57.8
Westmore Oaks Elementary	768	531	603	655	69.1	85.3
Elementary School Totals	**6,496**	**4,977**	**4,963**	**4,622**	**76.6**	**71.2**
High Schools						
River City High School	2,496	2,168	2,191	2,417	86.9	96.8
High School Totals	**2,496**	**2,168**	**2,191**	**2,417**	**86.9**	**96.8**
Other Schools						
Yolo High School	324	75	74	83	N/A	N/A
Washington Middle College High	330	171	174	189	N/A	N/A
WUVA	345	57	59	56	N/A	N/A
Clarendon Street[1]	937	0	0	0	N/A	N/A
Other School Totals	**1,936**	**303**	**307**	**328**	**N/A**	**N/A**
WUSD Totals	**10,928**	**7,448**	**7,466**	**7,367**	**68.2**	**67.4**

Source: Washington Unified School District. 2026. 2026 Supplemental FMP for the Purposes of Meeting Proposition 2 Requirements. Website: https://simbli.eboardsolutions.com/Meetings/Attachment.aspx?S=36030796&AID= 1415715&MID=48936(accessed March 13, 2026).

[1] Clarendon Elementary School is being used as temporary housing while construction is ongoing at other sites. The Clarendon Street campus will house the Elkhorn Village students for the 2025/26 school year.

Note: For 2024, the school with the highest percentage of available space is Westfield Village Elementary and the school that is impacted the most is Bridgeway Island Elementary.

Table 4.15.E: City of West Sacramento WUSD Five-Year Public School Enrollment Projections

School	Current Enrollment (2024-2025)	Future Enrollment (2025-2026)	Future Enrollment (2026-2027)	Future Enrollment (2027-2028)	Future Enrollment (2028-2029)	Future Enrollment (2029-2030)	Future Enrollment (2030-2031)
Elementary School Totals							
Bridgeway Island Elementary	1,062	1,033	998	982	962	924	911
Elkhorn Village Elementary	557	549	534	524	509	507	490
Riverbank Elementary	599	591	583	550	534	517	489
Southport Elementary	785	785	780	761	730	719	682
Stonegate Elementary	928	963	951	942	930	935	932
Westfield Village Elementary	515	523	514	502	489	473	463
Westmore Oaks Elementary	531	557	603	631	653	647	655
Elementary School Totals	4,977	5,001	4,963	4,892	4,807	4,722	4,622
High Schools							
River City High School	2,168	2,191	2,196	2,281	2,334	2,385	2,417
High School Totals	**2,168**	**2,191**	**2,196**	**2,281**	**2,334**	**2,385**	**2,417**
Other Schools							
Yolo High School	75	75	74	76	78	81	83
Washington Middle College High	171	172	174	182	186	187	189
WUVA	57	59	59	58	58	58	56
Other School Totals	**303**	**306**	**307**	**316**	**322**	**326**	**328**
WUSD Totals	**7,448**	**7,498**	**7,466**	**7,489**	**7,463**	**7,433**	**7,367**
Annual Change in Students	**N/A**	**50**	**(32)**	**23**	**(26)**	**(30)**	**(66)**

Source: Washington Unified School District. 2026. 2026 Supplemental FMP for the Purposes of Meeting Proposition 2 Requirements. Website: https://simbli.eboardsolutions.com/Meetings/Attachment.aspx?S=36030796&AID= 1415715&MID=48936(accessed March 13, 2026).
Note: Percent change values shown in parentheses indicate a negative trend (i.e., a decrease in enrollment).

Furthermore, it is expected that the Southport Elementary School, with a current enrollment of approximately 785 students and located at 2747 Linden Road, approximately 1.6 miles northeast of the project site, and River City High School, with a current enrollment of approximately 2,168 students and located at 1 Raider Lane, approximately 1.6 miles northeast of the project site, would be the primary schools serving the proposed project.[9]

[9] Washington Unified School District (WUSD). n.d. *Washington Unified School District Map*. Website: https://washingtonunifiedschoolexplorer.azurewebsites.net/ (accessed April 29, 2026).

4.15.3.4 Parks

Section 4.14, Recreation, provides a detailed discussion of parks and recreational facilities within the City of West Sacramento. According to the City's 2019 Parks, Recreation & Open Space Master Plan,[10] the City currently provides approximately 199 acres of parkland across 39 parks, along with approximately 790 acres of open space and more than 52 miles of trails for its residents. The park system includes a variety of park types, neighborhood parks, community parks, regional parks, and special use parks, distributed throughout the city to serve residents of all neighborhoods and support a wide range of recreational activities. The City's General Plan sets a goal of providing five acres of parkland per 1,000 residents. As of 2018, West Sacramento provided 3.68 acres per 1,000 residents, indicating a deficit of approximately 72 acres. To meet the projected population growth and achieve the City's parkland standard, an additional 110 acres of developed parkland will be needed by 2028.

To address this need, West Sacramento has identified over 470 acres of planned parkland across five park classifications. These include 5.8 acres of pocket parks, 45.8 acres of neighborhood parks, 24.9 acres of community parks, 190.8 acres of regional parks, and 204.9 acres of special use parks. These planned parks are expected to significantly improve geographic equity in park access and help close service gaps identified in the City's equity mapping analysis. Notable planned parks include Heritage Oaks Park, new parks within the Yarbrough and Liberty housing developments, and the Central Park project within the Stone Lock/Pioneer Bluff area. The Central Park project, which includes the Barge Canal Parkway and Stone Lock Plaza, is envisioned as a major recreational and cultural destination featuring trails, event spaces, a marina, and interpretive facilities. Additional planned improvements include the development of recreation features in the Bridge District and habitat restoration and public access enhancements at Bees Lake.

The closest existing parks to the project site include Bridgeway Lakes Community Park, located approximately 900 feet to the west, Sunset Vista located 0.28 miles- to the northeast, and Eagle Point Park, located approximately 0.3-mile to the southwest of the project site. These parks would provide access to amenities such as sports fields, playgrounds, trails, and open space, supporting both active and passive recreation for nearby residents.

[10] City of West Sacramento. 2019. *Parks, Recreation & Open Space Master Plan*. Website: https://www.cityofwestsacramento.org/home/showpublisheddocument/10072/637121797939770000 (accessed February 2026).

4.15.3.5 Public Libraries

The Yolo County Library provides public library services to approximately 146,000 residents of all areas of Yolo County, except the City of Woodland which independently provides public library services to its residents. The Yolo County Library operates eight branch libraries totaling approximately 88,369 gross square feet, housing 418,228 print and audio-visual items and 197 periodicals. Branch libraries are located in Clarksburg, Davis, Esparto, Knights Landing, West Sacramento, Winters, and Yolo.[11] The Arthur F. Turner Community Library branch located at 1212 Merkley Avenue is located approximately 4.0 miles northeast of the project site and would serve the proposed project.

As stated in the City's General Plan Draft EIR, guidelines for determining minimum library space requirements are maintained by the American Planning Association (APA). An evaluation of building size and condition is necessary to determine whether each structure can provide the necessary services. The standards for building size are generally expressed in terms of square feet per capita. The Experience Formulas for Library Size and Costs used by APA suggest minimum sizes that range from 0.3 square feet per capita for libraries that serve 50,000 people or more to 0.6 or 0.65 for those that serve 10,000–35,000 people. The Arthur F. Turner Community Library consists of an 18,000-square-foot facility, which according to the Yolo County Library Facilities Master Plan, is less than half of the recommended guidelines for library services for the current population being served. As such, library services in West Sacramento need expansion to meet needs of continued population growth in the Southport area and Bridge district; [12] however, according to the General Plan Draft EIR, the number, locations, and designs of future libraries and library expansions are unknown.[13]

4.15.4 Regulatory Setting

Federal, State, and local regulations and programs related to public services that are applicable to the proposed project are described below.

4.15.4.1 Federal Regulations

There are no federal regulations that apply to the proposed project with respect to public services.

4.15.4.2 State Regulations

Assembly Bills 2926, 1600, and 2751. To assist in providing facilities to serve students generated from new development projects, the State enacted Assembly Bill (AB) 2926 in 1986, which allows school districts to collect impact fees from developers of new residential, commercial, and industrial developments. Development impact fees are also referenced in the 1987 Leroy Greene Lease-Purchase Act, which requires school districts to contribute a matching share of the costs for the

11 Yolo County Library. 2017. *Yolo County Library Facilities Master Plan 2018–2035.* September 11. Website: https://yolocountylibrary.org/wp-content/uploads/sites/71/2018/10/abridgedFacilitiesMasterPl.pdf (accessed February 2026).

12 *Ibid.*

13 City of West Sacramento. 2016. *General Plan Update: Draft Environmental Impact Report,* August. SCH 2015082061. Website: https://www.cityofwestsacramento.org/home/showpublisheddocument/6444/636445527395230000 (accessed February 2026).

construction, modernization, or reconstruction of school facilities. Subsequent legislation has modified the fee structure and general guidelines. In 1987, the provisions of AB 2926 were expanded and revised by AB 1600, which limits the ability of a school district to levy School Fees unless (i) there is a need for the School Fee revenues generated, and (ii) there is a nexus or relationship between the need for School Fee revenues and the type of development project on which the School Fee is imposed. (The requirements of AB 1600 were clarified with the passage in 2006 of AB 2751, which codifies the findings of *Shapell Industries vs. Milpitas Unified School District*.)

Senate Bill 50 and California Education Code Section 17620. Senate Bill (SB) 50 and California Education Code Section 17620. SB 50, the Leroy F. Greene School Facilities Act of 1998, was signed into law on August 27, 1998. It is a program for funding school facilities largely based on matching funds. The approval of Proposition 1A authorized funds for SB 50 in the amount of $9.2 billion, including grants for construction of new schools and modernization of existing schools. The new construction grant provides funding on a 50/50 State and local match basis. The modernization grant provides funding on a 60/40 State and local match basis. Districts that are unable to provide some or all of the local match requirements and are able to meet financial hardship provisions may be eligible for additional State funding. SB 50 (codified as California Education Code Section 17620) allows the SVUSD to levy a fee, charge, dedication, or other requirement against any development project within its boundaries for the purpose of funding the construction or reconstruction of school facilities. The maximum fee amount that school districts can assess is limited by statutes provided in California Government Code Section 65995.

The payment of these fees by a developer serves to mitigate all potential impacts on school facilities that may result from implementation of a project to levels that are less than significant (see California Government Code Section 65996). Stated another way, the provisions of SB 50 provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in the California Environmental Quality Act (CEQA) or other State or local laws. The California Department of Education permits local school districts to increase facility fees subject to Department of Education review and with approval of a nexus study from the school district that demonstrates that costs incurred by the school district for the provision of school facilities and services are higher than Level 1 funding provides. In such an instance, a nexus must be demonstrated in the study between the increase proposed by the local school district and the actual cost of provision of school facilities and services.

California Building Code Title 24. Title 24 of the California Code of Regulations, also known as the CBC or Title 24, contains the design standards that govern the construction of buildings in California to "safeguard life or limb, health, property, and public welfare by regulation and controlling the design, construction, quality of materials, use and occupancy, location and maintenance of all buildings and structures and certain equipment." The 2022 Edition of the CBC contains general building design and construction requirements relating to fire and life safety, structural safety, and access compliance. The 2022 CBC edition became effective January 1, 2023.

California Fire Code. The California Fire Code (CFC) includes regulations for emergency planning, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution. Several fire safety requirements include installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building

materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildlife hazard areas.

Office of Emergency Services. The State of California passed legislation authorizing the Office of Emergency Services to prepare a Standard Emergency Management System (SEMS) program, which sets forth measures by which a jurisdiction should handle emergency disasters. Non-compliance with SEMS could result in the State withholding disaster relief from the non-complying jurisdiction in the event of an emergency disaster.

Quimby Act of 1975. The Quimby Act The Quimby Act (California Government Code 66477), enacted in 1966, is a state law, applied at the local level, that specifies the parkland dedication requirements for new residential subdivisions. The Quimby Act authorizes local jurisdictions to require developers of new residential subdivisions to dedicate up to three acres of park area per 1,000 persons or, if the amount of existing neighborhood and community park area exceeds that limit, the jurisdiction can require that existing ratio, not to exceed five acres of land per 1,000 persons, or to pay in-lieu fees for park or recreational purposes. The local jurisdiction must adopt Quimby Act provisions as part of its subdivision ordinance in order to impose the exactions allowed by the act. Alternatively, if the local jurisdiction has Quimby Act standards in its general plan, it can impose park and recreation exactions on subdivisions through the requirement that the subdivision be consistent with the general plan (California Government Code 66474[a]). Although the Quimby Act authorizes the dedication of new parkland, it does not address the development, operation, or maintenance of new park facilities. Therefore, the Quimby Act provides open space needed to develop park and recreational facilities, but does not ensure the development of the land or the provision of a park.

4.15.4.3 Regional Regulations

There are no regional regulations that apply to the proposed project with respect to public services.

4.15.4.4 Local Regulations

City of West Sacramento Municipal Code. [14] The West Sacramento Municipal Code includes regulations related to public facilities that are applicable to the proposed project.

> ***Parks and Community Service Facilities.*** Chapter 12.12 of the City's Municipal Code includes regulations associated with the use of building and park use, fundraising activities, permit procedures, and other provisions related to parks. Park use regulations include a list of activities that require permits for organized activities that involve groups of 50 or more people in a park or 10 or more people in a building for longer than 20 minutes, amplified sound, commercial activities, and fundraising activities. This code also includes a list of prohibited uses within parks, such as unleashed pets, firearms of any type, drinking alcoholic beverages, or contaminating

[14] City of West Sacramento. 2024. *Code of Ordinances Title 17 Zoning.* January 23. Website: https://ecode360.com/43205860?highlight=light,lighting,lights&searchId=23574634443875405#43205857 (accessed March 24, 2025).

park water features in any way. Activities such as golfing and swimming are only permitted within the appropriate designated areas.

Park Facility Development Fees. Chapter 12.30 of the City's Municipal Code imposes a park development fee as a condition of issuance of all building permits in the city. The City may, at its sole discretion, accept an offer to dedicate land for use as a city park from an applicant in lieu of all or any portion of a parks facilities development fee, when the land is substantially equal in value, as determined by the City, to the fee or portion of the fee imposed upon the applicant. Fees collected pursuant to Chapter 12.30 are used to finance the acquisition, development, renovation, improvement, and replacement of parks and recreational facilities and their development, including equipment for recreational purposes.

Police Facility Development Fees. Chapter 12.40 of the City's Municipal Code imposes a police facilities development fee as a condition of the issuance of all building permits in the city. The city council, shall, by resolution, set forth the specific amount of the police facilities development fee, identify the specific public improvements to be financed thereby, describe the estimated costs of the facilities, describe the reasonable relationship between the fee and the various types of new development, and describe the relationship between the need for the facility and the various types of new development.

Fire Facility Development Fees. Chapter 12.42 of the City's Municipal Code imposes a fire facilities development fee as a condition of the issuance of all building permits in the city. The city council, shall, by resolution, set forth the specific amount of the fire facilities development fee, identify the specific public improvements to be financed thereby, describe the estimated costs of the facilities, describe the reasonable relationship between the fee and the various types of new development, and describe the relationship between the need for the facility and the various types of new development.

City of West Sacramento General Plan 2035. The Public Facilities and Services Element of the West Sacramento 2035 General Plan contains the following goals and policies related to public services:

- **Goal PFS-1:** To ensure the provision of adequate and efficient facilities and services that maintain service levels, are adequately funded, and strategically allocated.
    - **Policy PFS-1.2:** The City shall require that new development pay its fair share of the cost of providing new public facilities and services and/or the costs of expanding/upgrading existing facilities and services impacted by new development.
    - **Policy PFS-1.7:** The City shall promote the clustering of public and quasi-public facilities (e.g., schools, parks, libraries, child care facilities, community activity centers), the joint-use of these facilities, and agreements for sharing costs and operational responsibilities among public service providers.
- **Goal PFS-7:** To provide for the educational and literacy needs of West Sacramento residents.

- **Policy PFS-7.5:** The City shall coordinate with the Washington Unified School District during the development review process for new residential development that could impact school facilities and services.

- **Policy PFS-7.6:** The City shall cooperate with the Washington Unified School District in an effort to ensure adequate financing for new school facilities, by assisting in the collection of school facility development fees from new residential and non-residential development.

- **Goal PFS-8:** To maintain an adequate level of police service as new development occurs to protect residents, visitors, and property.

  - **Policy PFS-8.2:** The City shall strive to provide new and expanded law enforcement facilities and services to adequately meet the needs of existing and future development.

  - **Policy PFS-8.3:** The City shall, through adequate staffing and patrol arrangements, endeavor to maintain the minimum feasible response times for police calls. The goal for average response time for Priority 1 (emergency) calls shall be five minutes.

- **Goal PFS-9:** To prevent loss of life, injury, and property damage due to wildland and structural fires, while ensuring an adequate level of fire protection service is maintained for all.

  - **Policy PFS-9.1:** The City shall provide new and expanded fire department facilities to adequately serve the needs of existing and future development.

  - **Policy PFS-9.2:** The City shall strive to achieve and maintain a fire insurance (ISO) rating of 3 or better in the developed areas of the city. The goal for average response time for Priority 1 (emergency) calls shall be five minutes for 90 percent of the calls.

  - **Policy PFS-9.4:** The City shall ensure that adequate water fire-flow capability is provided throughout the city and shall regularly monitor fire-flow to ensure adequacy. New residential and nonresidential development shall conform to fire flow requirements of the CFC.

  - **Policy PFS-9.8:** The City shall include Fire Department staff in the review of all new development projects to ensure compliance with State and other adopted fire safety and structural stability standards.

  - **Policy PFS-9.9:** The City shall minimize the dependence on fire department staff and equipment and improve fire safety by requiring installation of built-in fire suppression equipment in all new buildings exceeding 4,000 square feet, any building exceeding 25 feet in height from grade, or any building that is two or more stories regardless of height.

  - **Policy PFS-9.10:** The City shall require that new development provides all necessary water service, fire hydrants, and roads consistent with Fire Department standards.

  - **Policy PFS-9.11:** The City shall ensure that fire equipment access is integrated into the design of new developments, as well as the use of fire-resistant landscaping and building materials.

- **Policy PFS-9.14:** The City shall maintain Fire Department response time standards in order to provide adequate emergency medical services for all West Sacramento residents and visitors.

The Parks and Recreation Element of the City of West Sacramento General Plan 2035 contains the following applicable goals and policies related to public services:

- **Goal PR-1:** To establish and maintain a public park system and recreation facilities suited to the needs of West Sacramento residents and visitors.
  - **Policy PR-1.1:** The City shall maintain and implement the Parks Master Plan.
  - **Policy PR1.2:** The City shall require new residential development to help meet the City's park acreage as shown in Table PR-1 and established in the adopted Parkland Dedication Ordinance. To this end, the City shall require all new development the dedication of land, dedication of improvements, payment of in-lieu fees, or any combination of these determined acceptable by the City, to the extent authorized by law. Projects located in an area subject to a specific plan may employ alternative strategies to achieve recreation goals.
  - **Policy PR-1.5:** The City shall strive to provide park facilities within convenient walking-distance of all residents.
  - **Policy PR-1.6:** The City shall require that neighborhood parks be integrated into, and be focal points of new residential neighborhoods.

Southport Framework Plan. The Southport Framework Plan was adopted in 1998 to guide the development of Southport. Under the plan, Southport is anticipated to house a population of 42,344 at buildout and proposes providing 293 acres of parkland. The plan provides for neighborhood and community parks, an aquatic center along the Barge Canal, recreation opportunities along the canal system, a community center within the commercial node and recreation/open space opportunities along the Sacramento River.

West Sacramento Parks Master Plan. The City adopted the Parks, Recreation & Open Space Master Plan in 2019. The Master Plan provides a roadmap for future development of recreational facilities and opportunities for the City over the next 10 years, consistent with the General Plan 2035 requirements. This plan focuses on identifying the City's current and future recreation needs to aid City staff and decision-makers in providing and expanding and equitable distribution of recreational facilities and opportunities to West Sacramento residents and stakeholders. This includes preserving the City's open space areas and expanding the City's trails network to better connect people to nature, recreation and outdoor education opportunities. Primary outcomes of the Master Plan include:

- Evaluation of the existing parks, trails and open space system;
- Establishing the vision, goals and policies to guide decision-making;

- Documenting priorities and needs of the current and projected population growth based on data driven input;
- Developing a 10-year capital improvement plan that outlines projects, anticipated costs, potential funding sources, operation and maintenance implications and implementation strategy;
- Providing a record of issues discussed and decisions made; and
- Evaluation of current Park Impact Fees and other user fees charged and establishing cost thresholds.

Additionally, the Master Plan establishes a target of 5 acres of parkland per 1,000 residents.

4.15.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the proposed project would have a significant adverse impact with respect to public services if it would:

Threshold 4.15.1(i): Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection;

Threshold 4.15.1(ii): Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection;

Threshold 4.15.1(iii): Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools;

Threshold 4.15.1(iv): Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks; or

Threshold 4.15.1(v): Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities.

4.15.6 Project Impacts

Threshold 4.15.1(i): **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?**

Less Than Significant Impact. Impacts on fire protection services are considered significant if an increase in population or building area would result in inadequate response times or other performance objectives for fire protection and/or increased demand for services that would require construction of new fire protection facilities. The following analyzes project-related impacts to fire protection services that could occur with implementation of the proposed project.

Construction. Construction associated with the proposed project could increase the potential for accidental on-site fires from the operation of construction equipment, the use of flammable construction materials, and sparks during the removal of existing on-site vegetation. California Occupational Safety and Health Administration (CAL/OSHA) and the California Fire Code (CFC), require construction contractors to carefully store flammable materials in appropriate containers during project construction, use construction equipment with spark arrestors, and immediately and completely clean up spills of flammable materials if they occur. In addition, the construction contractor and construction personnel would be trained in emergency response, and fire suppression equipment specific to the construction site. This equipment would be available and maintained on site for the duration of the construction period. Adherence to existing laws would ensure that the proposed project would not have a significant construction-related impact on fire protection service from WSFD.

As described in Section 4.17, Transportation, the project site would be connected to the surrounding road network by way of four full-access roads: two off Marshall Road, Main Avenue opposite the intersection with Martinique Street and Street B, opposite the intersection with Jamaica Street; and two off Otis Avenue, Street D and Street F. [15] The proposed project would also construct local streets to facilitate circulation throughout the proposed residential development, all of which will be public and meet applicable City Standards. Additionally, the proposed offsite improvements along Marshall Road and Otis Avenue, have the potential to affect fire protection services, including emergency

[15] The street names identified in this EIR as part of the proposed project are temporary names. The permanent street names will be determined during the final design and development of the proposed project.

vehicle response times, by temporarily requiring partial lane closures, reducing roadway capacity, or increasing congestion. The construction contractor would be required to prepare and implement a Transportation Management Plan (TMP) (**Regulatory Compliance Measure TRA-1**) to be reviewed and approved by City staff. The TMP would be prepared consistent with the recommendations of the *California Temporary Traffic Control Handbook*[16] and would include provisions to maintain traffic flow along Marshall Road, safe access into and out of the project site, and emergency access to the project site and adjacent areas during construction. Implementation of the TMP would ensure that emergency vehicles and emergency service providers (i.e., WSFD personnel) are notified of any temporary lane closures in advance and can plan for adequate navigation to the project site and within the project area. Traffic management personnel (flag persons), required as part of the TMP would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. If partial lane closures are required, notice would be provided to the WSFD, and flag persons would be used to facilitate the traffic flow until construction is complete. With implementation of **Regulatory Compliance Measure TRA-1**, potential impacts related to emergency access during construction of the proposed project would not be impeded.

Due to the nature of project construction, there may be an incremental increase in demand for fire protection services. However, construction of the proposed project would be temporary and would not require the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities or infrastructure, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection. Impacts would be less than significant, and mitigation is not required.

Operation. As stated in Section 4.14, Population and Housing, the proposed project would add approximately 725 new residents to the project site, potentially increasing demand for fire protection services in the City. Although the City's General Plan does not establish a service ratio for the WSFD, Policy PFS-9.2 as identified above in Section 4.15.4, Regulatory Setting, establishes a goal for average WSFD response time for Priority 1 calls to be five minutes for 90 percent of calls. In addition, the National Fire Protection Association (NFPA) Standard 1710 establishes five minutes and 20 seconds as a benchmark time goal.[17] In 2025, the WSFD had an average response time of four minutes and 59 seconds including an approximately one minute turnout time,[18] meeting the goal established by the NFPA and the City's General Plan goal of five minutes. The addition of approximately 725 new residents would not be expected to result in an increase in demand that would exceed the NFPA response time goal.

Although the proposed project would generate approximately 725 new residents and may increase demand for fire protection services, the project would be required to participate in the City's

16 California Inter-Utility Coordinating Committee. 2018. *California Temporary Traffic Control Handbook*, 7th Edition. May.

17 City of West Sacramento. n.d. *West Sacramento Fire Department 2024 Annual Report*. Website: https://www.cityofwestsacramento.org/home/showpublisheddocument/20443/638822029379800000 (accessed February 2026).

18 City of West Sacramento. 2026. Personal communication with LSA. April 20.

planned Fire Services Community Facilities District (CFD), which will provide a dedicated revenue source for ongoing fire operations, including staffing and equipment needed to serve new growth. Furthermore, the project site has been designated for development since the adoption of the Southport Framework Plan. Accordingly, the anticipated increase in service demand is consistent with planned growth and would not result in substantial or unanticipated impacts on fire protection services or emergency response times. Additionally, pursuant to Chapter 12.42, Fire Facilities Development Fees, of the City's Municipal Code,[19] the Project Applicant would be required to pay a development fee to the City of West Sacramento as specified below in **Regulatory Compliance Measure PS-1** to fulfill its requirement to offset the costs of increased personnel or equipment that could be required to maintain acceptable service ratios, response times, and other performance objectives for the City and the project site.

Additionally, all roadways within the project site would be developed in accordance with applicable City and WSFD ordinances and codes related to emergency access standards, including those in the WSFD Fire Code and the CFC. Compliance with applicable ordinances and codes would ensure adequate access to, from, and within the project site for emergency vehicles during operation of the proposed project. Water availability, fire water flow, and hydrant placement throughout the proposed project would be reviewed and verified by the WSFD to ensure compliance with local and State codes.

With implementation of **Regulatory Compliance Measure PS-1**, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire facilities, or the need for new or physically altered fire facilities, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection. Impacts would be **less than significant**, and mitigation is not required.

Threshold 4.15.1(ii): Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?

Less Than Significant Impact. Impacts on police protection services are considered significant if an increase in population would result in inadequate response times or other performance objectives for police protection and/or increased demand for services that would require construction of new police protection facilities. The following analyzes project-related impacts to police protection services that could occur with implementation of the proposed project.

Construction. Construction activities, including offsite improvements at the intersection of Marshall Road and Otis Avenue, have the potential to affect law enforcement services, such as emergency vehicle response times, by potentially requiring temporary lane closures. However, the construction

[19] City of West Sacramento. 2024. Code of Ordinances. *Title 12 Streets, Sidewalks and Public Places, Chapter 12.42 Fire Facilities Development Fees.* Website: https://ecode360.com/43202524 (accessed February 2026).

contractor would maintain traffic flow on these streets, safe access into and out of the project site, and emergency access to the project site and adjacent areas during construction, consistent with the recommendations of the *California Temporary Traffic Control Handbook (***Regulatory Compliance Measure TRA-1**).[20] Implementation of **Regulatory Compliance Measure TRA-1** would ensure that emergency vehicles and emergency service providers (i.e., law enforcement) are notified of any detours or lane closures in advance and can plan for adequate navigation to the project site. Traffic management personnel (flag persons) would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with law enforcement vehicle access. If temporary lane closures are required, notice would be provided to WSPD, and flag persons would be used to facilitate the traffic flow until construction is complete.

Active construction sites are often vulnerable to criminal activity during non-construction hours due to storage on site of unsecured construction materials and construction equipment and vehicles containing gasoline and diesel fuel. To minimize trespassing, the project site would be fenced, and during non- construction hours, access points would be locked. Therefore, impacts to police protection services during construction would be **less than significant**, and mitigation is not required.

Operation. As stated in Section 4.14, Population and Housing, the proposed project is anticipated to generate an increase in population of approximately 725 persons. As a result, the proposed project may see a corresponding increase in law enforcement calls for service to the project site. Currently, the undeveloped site is patrolled by WSPD's Beat 3 officers who patrol the southern portion of the city. Beat 3 officers would continue to patrol the area, including the proposed project.

According to the draft Fiscal Impact Analysis completed for the proposed project,[21] it was determined that the project would require additional police personnel; however, it was concluded that project generated tax revenue would be adequate to fully offset these police service costs. Pursuant to Chapter 12.40 (Police Facilities Development Fees) of the City's Municipal Code, the proposed project would be required to implement **Regulatory Compliance Measure PS-2**, which would require that the Project Applicant(s) pay a development fee to the City of West Sacramento. The development fee paid would increase capital funding to mitigate impacts of new development on the level of service capacity in existing facilities.

As discussed above, based on the 2025 United States Census population estimates, the City has a current population of approximately 56,216 residents.[22] Assuming staffing levels remain unchanged, the current officer-to-resident ratio would be 1.1 officers per 1,000 residents. Although the City does not have a threshold for police staffing ratios, the officer-to-resident ratio of 1.1[23] officers per 1,000 residents indicates that police coverage has increased relative to the growing population and does not reflect a deficiency in available law enforcement resources on a per-capita basis. With the addition of 725 new residents, the total population would increase to approximately 56,941.[24]

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20 California Inter-Utility Coordinating Committee. 2018. *California Temporary Traffic Control Handbook*, 7th Edition. May.

21 City of West Sacramento. 2026. *Draft Brar Farms Fiscal Impact Analysis*. June 30.

22 *Ibid.*

23 (64 actual sworn officers/ 56,216 residents) x 1000 = 1.1 officer-to-resident ratio

24 56,216 current 2025 population + 725 residents from the proposed project = 56,941 people

Accordingly, the officer-to-resident ratio would remain at 1.1 officers per 1,000 residents,[25] indicating that the proposed project would not create a deficiency in police coverage or support services assuming current staffing levels.

As stated above in Section 4.15.3, Existing Environmental Setting, the City has partnered with Measures for Justice, an organization that provides information on police response times and other law enforcement service data. Based on this information, the City has also adopted a goal of maintaining or reducing a 10.9 minute response time for community generated calls through March 2026. The City's overall median response time in 2025 was 11 minutes. Therefore, the City's current median police response time of 11 minutes exceeds the City's goal of maintaining a 10.9 minute response time.

Although implementation of the proposed project would not create a deficiency in police coverage, the project would result in increased response times, which are already above the City's 10.9 minute response time goal. Pursuant to Chapter 12.40 (Police Facilities Development Fees) of the City's Municipal Code,[26] the proposed project would be required to implement **Regulatory Compliance Measure PS-2**, which would require that the Project Applicant(s) pay a development fee to the City of West Sacramento. The development fee paid would increase capital funding to mitigate impacts of new development on the level of service capacity in existing facilities. Payment of these fees would generate increased funding for police protection services to offset the increase in demand. Accordingly, construction and operation of the proposed project would have a **less than significant impact** on police protection.

Threshold 4.15.1(iii): Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?

Less Than Significant Impact. The proposed project is expected to add new students to the WUSD, primarily at Southport Elementary School and River City High School. The closest elementary school to the project site is Bridgeway Island Elementary School; however, this school is located outside the service area for the project site. The WUSD 2024 Developer Fee Justification Study provides student yield factors used to estimate student generation from new residential development. According to WUSD, the student yield factors are 0.2072 students per household for grades TK through sixth, 0.0626 students per household for grades seventh through eighth, and 0.1204 students per household for grades ninth through 12th.[27] Using these rates, the proposed project's 259 dwelling

[25] (64 actual sworn officers / 56,941 residents) x 1000 = 1.1 officer-to-resident ratio

[26] City of West Sacramento. 2024. Code of Ordinances. *Title 12 Streets, Sidewalks and Public Places, Chapter 12.40 Police Facilities Development Fee*s. Website: https://ecode360.com/43202519#43202520 (accessed February 2026).

[27] Washington Unified School District. 2024. *2024 Developer Fee Justification Study for Washington Unified School District.* Website: https://simbli.eboardsolutions.com/Meetings/Attachment.aspx?S=36030796&AID=838833&MID=30877 (accessed February 2026).

units are estimated to generate approximately 52 TK–sixth grade students, 17 seventh to eighth grade students, and 32 ninth to 12th grade students, for a total of approximately 101 students (see **Table 4.15.F: Projected School Enrollment**).

Table 4.15.F: Projected School Enrollment

Grade Level	Student Generation Factor	Projected Enrollment[1]
TK–6	0.20072	52
7–8	0.0629	17
9–12	0.1204	32
Total	--	**101**

Source: Washington Unified School District. 2024. *2024 Developer Fee Justification Study.* May

[1] Based on 259 dwelling units associated with project buildout.

The increase in students would place additional demand on school facilities. It is assumed that most of the estimated 69 TK through eighth grade students would attend Southport Elementary School, located approximately 1.6 miles northeast of the project site. Similarly, a portion of the estimated 32 ninth to 12th grade students would attend River City High School, approximately 1.6 miles northeast of the site. According to the WUSD's 2026 Supplemental Facilities Master Plan, and as detailed in **Table 4.15.D**, above, Southport Elementary School currently has net classroom capacity of 973 students, with 152 seats available. River City High School currently has a net classroom capacity of 2,496 students, with 328 seats available.[28] Additionally as shown in **Table 4.15.G: Projected Enrollment and Capacity for Schools Serving the Project Site**. Implementation of the proposed project would result in Southport Elementary School operating at approximately 88 percent of its classroom capacity, while River City High School would operate at approximately 89 percent of its classroom capacity.

[28] Washington Unified School District. 2026. *2026 Supplemental FMP for the Purposes of Meeting Proposition 2 Requirements*. January.

Table 4.15.G: Projected Enrollment and Capacity for Schools Serving the Project Site

School	Current Enrollment (2024-2025)	Projected Enrollment of the Proposed Project [1]	Total Enrollment Plus Project	Net Classroom Capacity[2]	Percent Capacity Plus Project[3]
Southport Elementary School (TK-8)	785	69	854	973	88
River City High School (9-12)	2,191	32	2,223	2,496	89
WUSD Total	7,448	101	7,549	10,928 [4]	69

Source: Washington Unified School District. 2026. *2026 Supplemental FMP for the Purposes of Meeting Proposition 2 Requirements.* Website: https://simbli.eboardsolutions.com/Meetings/Attachment.aspx?S=36030796&AID=1415715&MID=48936(accessed March 13, 2026).

[1] Total Enrollment Plus Project was calculated by adding the project-generated students to the District's projected school-year enrollment for 2024–2025.

[2] School classroom capacity amounts were taken from the WUSD 2026 Supplemental Facilities Master Plan.

[3] Percent of Capacity Plus Project calculated as (Total Enrollment Plus Project/Net Class Capacity) ×100

[4] This total includes Clarendon Elementary School. Clarendon Elementary School is being used as temporary housing while construction is ongoing at other sites. The Clarendon Street campus will house the Elkhorn Village students for the 2025/26 school year.

Based on the above, the proposed project would not result in Southport Elementary School exceeding its classroom capacity, and it is likely that a portion of the estimated students produced by the proposed project may be accommodated by nearby schools within the WUSD. The Bridgeway Island Elementary School, located approximately 0.38 mile north of the project site at 3255 Half Moon Bay Circle, currently enrolls 1,062 students and has a net classroom capacity of 1,169, with 107 seats available. This surplus in capacity would allow Bridgeway Island Elementary School to help absorb new students, reducing potential overcrowding at Southport Elementary School.[29]

In addition, according to the National Center for Education Statistics, Southport Elementary had a student–teacher ratio of 21.87:1 and River City High School had a ratio of 21.99:1 for the 2024 to 2025 school year.[30] These ratios exceed the national average for public schools of 15.2:1 and the California average of 21.67:1,[31] indicating that WUSD schools are currently operating with high classroom loads. While River City High School and Southport Elementary have sufficient classroom capacity to accommodate additional students generated by the proposed project, the elevated staffing ratios suggest that instructional resources could be strained if enrollment increases without corresponding additions of teachers or support staff.

The WUSD Facilities Master Plan includes planned improvements across multiple priority areas, including:

[29] Washington Unified School District (WUSD). 2026. *2026 Supplemental FMP for the Purposes of Meeting Proposition 2 Requirements.* January.

[30] National Center for Education Statistics. 2024. Directory Information (2024-2025 school year). Website: https://nces.ed.gov/ccd/schoolsearch/school_list.asp?Search=1&DistrictID=0641580 (accessed March 13, 2026).

[31] National Center for Education Statistics. 2024. EISi table Generator. Website: https://nces.ed.gov/ccd/elsi/tableGenerator.aspx?savedTableID=655701 (accessed March 13, 2026).

- Campus Equity: The Campus Equity priority provides needed improvements at each site to ensure functional and operational equity across the district, with a focus on older K–8 campuses that have not received recent modernization. Planned improvements vary by site and may include exterior security cameras, door security upgrades, deferred maintenance, modernization of classrooms, multipurpose rooms, kitchens, libraries, student and staff restrooms, administrative areas, gyms, and PE facilities, as well as acoustical upgrades in instructional spaces.

- Visual and Performing Arts (VAPA): The VAPA priority includes construction of a new 1,000-seat performing arts center at River City High School, dedicated music/band and art classrooms at each K–8 campus, improvements to acoustics, provision of adequate band and art storage, and creation of district-wide performance spaces to better support instruction and student learning.

- Positive Campus Climate and Exterior Enhancements: The Positive Campus Climate and Exterior Enhancements priority includes landscaping and campus greening, grading and drainage improvements, regrading of playfields, new shade structures and covered lunch areas, creation of outdoor classroom and quad spaces, perimeter fencing and gate hardware upgrades, parking and ADA improvements, replacement of gutters, fascia, and downspouts, and display spaces in corridors to enhance the educational environment outside the classroom.

- The Future-Ready Classroom priority includes reconfiguration of existing permanent classrooms, replacement of portable classrooms with new permanent construction, upgrades to audiovisual and IT systems, installation of tempered glass whiteboards, energy-efficient windows, new flooring and paint, creation of display spaces in corridors, reshuffling of classrooms, and modernization of administrative areas to support flexible, modern teaching environments.

- Early Childhood Education: The Early Childhood Education priority includes construction of additional classrooms, replacement of portable classrooms, reconfiguration of existing classrooms for age-appropriate instruction, and upgrades to technology and IT infrastructure.

Collectively, these planned improvements across all priority areas would enhance instructional and support spaces, improve campus functionality, and help ensure that WUSD schools can continue to provide adequate learning environments for current and future students.

Pursuant to California Education Code Section 17620(a)(1), the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district for the purpose of funding the construction or reconstruction of school facilities. The Applicant/Developer would be required to pay such fees to reduce any impacts of new residential development on school services as provided in Section 65995 of the California Government Code (refer to **Regulatory Compliance Measure PS-3** below).

Furthermore, pursuant to the provisions of Government Code Section 65996, a project's impact on school facilities is fully mitigated through payment of the requisite school facility development fees current at the time a building permit is issued. According to the WUSD, the current Development Impact Fees for projects within the WUSD's jurisdictional boundaries has increased to $5.17 per square foot of enclosed residential floor space and $0.84 per square foot of chargeable covered and

enclosed commercial/industrial space.[32] Therefore, with payment of the required fees, as outlined in **Regulatory Compliance Measure PS-3**, the Project Applicant would be required to pay development fees to reduce any impacts of the proposed residential development. Potential impacts to school services and facilities associated with implementation of the proposed project would be **less than significant**. No mitigation is required.

Threshold 4.15.1(iv): Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?

Less Than Significant Impact. The proposed project would subdivide an approximately 60-acre project site into 259 lots for future development of single-family homes, 15 lots for open space and park use, and associated landscaping, roadway, and utility improvements. As described in Section 4.14, Population and Housing, and based on the average for the city of 2.8 persons per household, development of the proposed project is expected to result in approximately 725 new residents.[33] These new residents would use public parks and recreational facilities in the surrounding area, including those within the city. As discussed in Section 4.16, Recreation, the City's Parks, Recreation and Open Space Master Plan,[34] states a goal of providing five acres of land per 1,000 residents for park and recreational purposes. As of 2019, the City had 199 acres of park land available to its residents and provided 3.68 acres of park land per 1,000 residents based on the City's 2018 population. Currently, the City has a population of 56,216 residents [35] and it provides approximately 3.54 acres of parkland per 1,000 residents,[36] which does not meet the City's parkland objective of five acres per 1,000 residents. With the addition of 725 new residents from the proposed project, the total population would increase to approximately 56,941,[37] and the City's parkland ratio would decrease slightly to 3.49 acres per 1,000 residents, which also remains below the City's goal.[38]

As specified in Chapter 12.30 of the City's Municipal Code, the City imposes a park development fee as a condition of issuance of all building permits to dedicate land for use as a city park. Per Section 12.30.020 of the Municipal Code, the City may, in its sole discretion, accept from an applicant for a building permit an offer to dedicate land for use as a city park in lieu of all or any portion of a parks

[32] Washington Unified School District (WUSD). 2024. Developer Fees. Website: https://www.wusd.k12.ca.us/Departments/Business-Services/Facilities-Construction--Planning/Developer-Fees/index.html (accessed February 2026).

[33] 259 households x 2.8 persons per household = 725 persons

[34] City of West Sacramento. 2019. *Parks, Recreation & Open Space Master Plan.* Website: https://www.cityofwestsacramento.org/home/showpublisheddocument/10072/637121797939770000 (accessed February 2026).

[35] United States Census Bureau. 2025. *QuickFacts: West Sacramento City, California*. Website: https://www.census.gov/ quickfacts/fact/table/westsacramentocitycalifornia/PST045224 (accessed July 16, 2026).

[36] 199 acres/ 56,216 residents × 1,000 = 3.54 acres per 1,000 residents

[37] 56,216 current 2025 population + 725 residents from the proposed project = 56,941 residents

[38] 199 acres /-56,941 (total population including the additional 725 residents) x 1,000 = 3.49 acres per 1,000 residents

facilities development fee, when the land is substantially equal in value, as determined by the city, to the fee or portion of the fee imposed upon said applicant.

As part of the proposed project, approximately 6.65 acres of open space consisting of a 0.68-acre Central Park, a 0.14-acre parklet, 1.81 acres of landscaped lots, and a 4.02-acre detention basin would be provided for both passive and active recreational uses by residents of the development. These recreational and open space areas would also be publicly accessible to West Sacramento residents; however, the 6.65 acres of open space, including the recreational elements of the detention basin, park, and landscaped lots, would be privately owned and maintained by a future Homeowners Association (HOA). Accordingly, the 6.65 acres of open space would not be counted as dedicated public parkland for purposes of the City's parkland inventory.

As discussed in Section 4.14, Population and Housing, the proposed project is consistent with the City's Regional Housing Needs Allocation (RHNA) and Sacramento Area Council of Governments (SACOG) population projections and residents of the proposed project are expected to come from the city and surrounding area. It is expected that residents of the proposed project would utilize the park facilities associated with the proposed project due to proximity to their residences. Therefore, the proposed project would not be expected to substantially increase the use of existing neighborhood and regional parks or other recreational facilities to the degree that substantial physical deterioration of the facility would occur or be accelerated.

As stated above, the City would require a parks facilities development fee for all building permits in the City (see **Regulatory Compliance Measure PS-4**). Implementation of the proposed project would not negatively affect the City's existing parkland-to-resident ratio when compared to existing conditions. Therefore, impacts related to park facilities, which would generate the need for new parks or an expansion of existing parks, the construction of which could cause significant environmental impacts, would **be less than significant**, and no mitigation is required.

Threshold 4.15.1(v): Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?

Less Than Significant Impact. The nearest public library to the project site is the Arthur F. Turner Community Library, located at 1212 Merkley Avenue, approximately four miles to the northeast. Short-term construction activities would not have any impact on this facility. It is not anticipated that construction activities would generate demand for library services as construction workers would typically commute to and from the site and would be more likely to utilize local public services such as libraries in their own communities.

Demand for library services is typically determined based on the size of the resident population. As stated in Section 4.14, Population and Housing, the proposed project would result in 725 new residents, which would not introduce substantial unplanned population growth to the area. Currently, the Arthur F. Turner Community Library provides approximately 18,244 square feet of

library space and houses a collection of books, CDs, and videos. According to the City's General Plan Update Draft Environmental Impact Report,[39] the American Planning Association (APA) recommends library space standards ranging from 0.3 square feet per capita for communities with populations over 50,000 to 0.6 to 0.65 square feet per capita for communities with populations between 10,000 and 35,000. Based on these guidelines, the City of West Sacramento, with a 2025 population of 56,216,[40] would require approximately 0.3 square feet of library space per capita. The Arthur F. Turner Library currently provides approximately 0.35 square feet per capita, [41] which is above the APA's minimum standard.

With the addition of 725 new residents, the total population would increase to approximately 56,941.[42] Per the County's standard, upon development the proposed project would generate a need for approximately 253 additional square feet of library space.[43] According to the Yolo County Library Facilities Master Plan (2018–2035), the need for expansion of the Arthur F. Turner Community Library was previously identified in an evaluation of library services in the City of West Sacramento. The Master Plan also determined that a new library facility of approximately 33,000 square feet in the southern area of West Sacramento would be necessary to meet the minimum threshold space standards for a projected population of 44,000 in that area by 2030.

Funding for library services comes primarily from property tax revenue and library fines and fees collected from patrons, as well as from state, federal, or government aid. However, implementation of the proposed project would generate additional funding for the City and County through generation of additional property tax revenue. These funds could be used for the development of new or expanded library facilities or new library equipment if required. The allocation of additional tax revenues would be at the discretion of City policymakers based on City needs.

In addition to public libraries, the proposed project would result in an incremental increase in the demand for public facilities such as City Hall. Accordingly, the proposed project would be required to implement **Regulatory Compliance Measure PS-5**, which would require that the Project Applicant pay a development fee to the City of West Sacramento. These fees would be directed towards providing new City Hall facilities and equipment, which would ensure that any impact to public facilities that could result from the proposed project would be offset by development fees, and in effect, reduce potential impacts to a less than significant level. Therefore, impacts related to public facilities, which would generate the need for new facilities or an expansion of existing facilities, the construction of which could cause significant environmental impacts, would be **less than significant**, and no mitigation is required.

4.15.7 Cumulative Impacts

Less Than Significant Impact. As defined in Section 15355(b) of the *State CEQA Guidelines*, cumulative impacts refer to the incremental impacts of the project added to other closely related

39 City of West Sacramento. 2016. *General Plan Update Draft Environmental Impact Report*. August.

40 United States Census Bureau. 2025. *QuickFacts: West Sacramento City, California*. Website: https://www.census.gov/quickfacts/fact/table/westsacramentocitycalifornia (accessed July 16, 2026).

41 Yolo County Library. 2017. *Yolo County Library Facilities Master Plan 2018–2035.* September 11.

42 56,216 current 2025 population + 725 residents from the proposed project = 56,941 people

43 725 residents × 0.35 square feet / capita = 253 square feet (rounded to nearest tenth)

past, present, and reasonably foreseeable probable future projects. The cumulative study area for public services is described in Chapter 4.0, Existing Setting, Environmental Analysis, Impacts, and Mitigation Measures, which includes a list of cumulative projects **Table 4.A**, and a map of the cumulative project locations, **Figure 4-1**. Cumulative impacts on public services are evaluated in the context of both the project site and the City, in coordination with the respective service providers responsible for managing and maintaining adequate service levels.

The need for new and/or maintenance of existing public services and associated facilities is measured by service area population, or the number of residents and workers within the City's service area, as well as the type and density of development. As additional development occurs in the City, there may be an overall increase in the demand for fire protection and law enforcement services, including personnel, equipment, and/or facilities. Increases in demand are routinely assessed by these agencies as part of the annual monitoring and budgeting process. Although the proposed project would include residential uses which would result in approximately 725 new residents, [44] the proposed project is consistent with the City's RHNA and SACOG population projections and residents. Additionally, as noted in Section 4.14, Population and Housing, upon full buildout of the 26 cumulative projects, it is estimated that approximately 31,105 new residents would be added. Development of the proposed project, together with the 26 cumulative projects, would result in a cumulative increase of approximately 31,830 new residents in the City, resulting in a total cumulative population of 88,046.

While this would represent an increase in the overall City's population, this growth is consistent with the regional growth forecast in the SACOG's Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) and the City's General Plan Housing Element. Therefore, the proposed project, along with the 26 cumulative projects, would be accommodated within the long-term growth planning of both agencies and would not substantially increase service demands. Further, future development projects in the City would continue to undergo environmental review and, where applicable, pay development fees proportional to the scale of development.

Fire Protection. The geographic area for cumulative analysis of fire protection services is defined as the service territory of Fire Station No. 42. Although the proposed project would increase calls for service, it would not result in the need for additional or physically altered fire facilities. The increase in calls for service is not expected to result in an excessive increase in calls for service. Therefore, the proposed project would not have a cumulatively significant impact on the provision of fire services. Of the 26 cumulative projects, seven would potentially be served by Fire Station No. 42. Operation of the cumulative projects in relation to the proposed project would increase the overall demand for fire protection services provided by Fire Station No. 42 and within the City. As discussed in Section 4.14, Population and Housing, population growth generated by the proposed project in conjunction with cumulative projects, would not result in substantial unplanned population growth. Thus, the proposed project and the cumulative project's population increase would be accommodated as part of WSFD's long-term growth planning for fire and other public facilities. Additional demands for fire protection services would be funded by existing funding sources (i.e., property tax and government funding), to which the proposed project and cumulative projects would contribute. Moreover, pursuant to Chapter 12.42, Fire Facilities Development Fees, of the City's Municipal Code, the

[44] 259 households x 2.8 persons per household = 725 persons

proposed project and all other cumulative developments projects within the WSFD service area would be required to adhere to **Regulatory Compliance Measure PS-1**, which would require the Project Applicant(s) to pay applicable fire facilities development fees to the City of West Sacramento. Therefore, the proposed project's contribution to fire protection impacts would not be cumulatively considerable, and no mitigation is required.

Police Protection. The geographic area for cumulative analysis of police protection services is defined as the service area for the West Sacramento Police Department. Although the proposed project would result in an incremental increase in calls for service, it would not result in the need for additional or physically altered police facilities.

All 26 cumulative projects listed in **Table 4.A**, in Chapter 4.0, Environmental Analysis, Impacts, and Mitigation Measures, are located within the City of West Sacramento. As discussed previously, population growth generated by the proposed project in conjunction with cumulative projects cumulative projects would not result in substantial unplanned population growth. As such, the proposed project and the cumulative related project's demand for police services would be accommodated by the WSPD's long-term growth planning for police protection services and facilities. Additionally, additional demands for WSPD services would be funded by existing funding sources (i.e., property taxes and government funding), to which the proposed project and cumulative projects would contribute. Moreover, pursuant to Chapter 12.40, Police Facilities Development Fees, of the City's Municipal Code, the proposed project and all other cumulative developments projects within the WSPD service area would be required to adhere to **Regulatory Compliance Measure PS-2**, which would require the Project Applicant(s) to pay applicable police facilities development fees to the City of West Sacramento. Therefore, the proposed project's contribution to police protection impacts would not be cumulatively considerable, and no mitigation is required.

Schools. The geographic area for cumulative analysis of school services includes the school district that serves the proposed project (WUSD). Additionally, all of the 26 cumulative projects listed in **Table 4.A**, would be located within the boundaries of the WUSD. As described above, the proposed project would not result in significant impacts on school facilities. However, a cumulative increase in the demand for school services is anticipated to take place with the development of future residential projects, the proposed project itself, and more specifically, the future household growth within the school boundaries currently servicing the project site.

As discussed above, upon full buildout of the 26 cumulative projects, it is estimated that approximately 11,109 residential units would be added within the City resulting in an additional 31,105 new residents. Development of the proposed project, together with the 26 cumulative projects, would result in a cumulative increase of approximately 11,368 residential units resulting in 31,830 new residents in the City. Accordingly, upon full buildout of the proposed project including the 26 cumulative projects, it is estimated that approximately 4,366 students total students (2,282 TK through sixth grade students, 715 seventh through eighth grade students, and 1,369 ninth

through 12th grade students) would be generated within WUSD.[45] Although this represents a substantial increase in demand for school facilities, all future development projects in the City would be subject to environmental review and would be required to demonstrate that implementation of the project would not substantially impact school services. In addition, all future development projects would be required to pay full payment of requisite development fees pursuant to California Government Code Section 65995 and Chapter 3.16 of the City's Municipal Code (as described in **Regulatory Compliance Measure PS-3**). Because the proposed project and all future cumulative projects would be required to pay school fees as required by **Regulatory Compliance Measure PS-3**, cumulative impacts that the proposed project may have on school services would be less than significant. Therefore, the proposed project's contribution to school impacts would not be cumulatively considerable, and no mitigation is required.

Parks. Section 4.16, Recreation, of this Draft EIR, contains a detailed discussion of the proposed project's potential impacts on parks and recreational facilities. As discussed therein, the proposed project and the applicable cumulative projects would not result in a significant cumulative impact to park and recreational facilities and the incremental contribution of the proposed project to a potentially significant impact would not be cumulatively considerable.

4.15.8 Level of Significance Prior to Mitigation

The proposed project would result in less than significant impacts related to public services.

4.15.9 Regulatory Compliance Measures and Mitigation Measures

4.15.9.1 Regulatory Compliance Measures

The proposed project would comply with the following standards, the implementation of which is intended to reduce impacts related to public services. In addition, the proposed project would also be required to comply with **Regulatory Compliance Measure TRA-1**, as specified in Section 4.17, Transportation.

Regulatory Compliance Measure PS-1	**Payment of Fire Facilities Development Fees.** In accordance with Chapter 12.42 of the City of West Sacramento Municipal Code, prior to the issuance of building permits, the Project Applicant shall pay the most current Fire Facilities Development Fee for residential development, as calculated by the City. Building permits will be issued only after the City has received proof of payment of the required fee.
Regulatory Compliance Measure PS-2	**Payment of Police Facilities Development Fees.** In accordance with Chapter 12.40 of the City of West

[45] Cumulative student generation was calculated using student yield factors from the WUSD 2024 Developer Fee Justification Study. These factors include 0.20072 students per dwelling unit for grades TK through sixth, 0.0629 students per dwelling unit for grades seventh through eighth, and 0.1204 students per dwelling unit for grades ninth through 12th. These rates were applied to 26 cumulative projects within WUSD, which comprise of a total 11,109 dwelling units.

Sacramento Municipal Code, prior to the issuance of building permits, the Project Applicant shall pay the most current Police Facilities Development Fee for residential development, as calculated by the City. Building permits will be issued only after the City has received proof of payment of the required fee.

Regulatory Compliance Measure PS-3

Payment of School Impact Fees. In accordance with Chapter 3.16 of the City of West Sacramento Municipal Code, and pursuant to Section 65995 of the California Government Code, prior to issuance of any building permits, the Project Applicant shall provide proof to the Director of the City of West Sacramento Community Development Department, or designee, that payment of the most current School Impact Fee for residential development, as calculated by the City, has been made. Building permits will be issued only after the City has received proof of payment of the required fee.

Regulatory Compliance Measure PS-4

Payment of Park Facility Development Fees. In accordance with Chapter 12.30 of the City of West Sacramento Municipal Code, prior to issuance of any building permits, Project Applicant shall provide proof to the Director of the City of West Sacramento Community Development Department, or designee, that payment of the most current Park Facility Development Fee for residential development, as calculated by the City, has been made. Building permits will be issued only after the City has received proof of payment of the required fee.

Regulatory Compliance Measure PS-5

Payment of City Hall Facilities Development Fees. In accordance with Chapter 12.48 of the City of West Sacramento Municipal Code, prior to issuance of any building permits, the developer or Project Applicant shall provide proof to the Director of the City of West Sacramento Community Development Department, or designee, that payment of the most current City Hall Facilities Development Fee for residential development, as calculated by the City, has been made. Building permits will be issued only after the City has received proof of payment of the required fee.

4.15.9.2 Mitigation Measures

The proposed project would not result in potentially significant impacts related to public services, and no mitigation is required.

4.15.10 Level of Significance after Mitigation

The proposed project would result in less than significant impacts related to public services.

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4.16 RECREATION

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for the proposed Brar Farms Residential Development Project (proposed project) to impact recreation in the City of West Sacramento (City). This section is based in part on information provided in the City's General Plan, the City's Parks, Recreation, & Open Space Master Plan, the City's Bicycle, Pedestrian, and Trails Master Plan, and applicable provisions of the City's Municipal Code.

4.16.1 Scoping Process

Several comments received during the scoping period addressed recreation. These comments raised concerns about insufficient investment in recreation and community services, lack of park and green space, and elimination of open fields that provide recreational value.

4.16.2 Methodology

The evaluation of project-related impacts to parks and other recreational facilities was based on whether the proposed project would cause an increase in use of existing parks and recreational facilities: (1) resulting in a physical deterioration of the existing facilities; or (2) necessitating the construction or expansion of new facilities to serve the project demand. For the purposes of this analysis, "recreational facilities" are defined as parks and designated public areas used for active or passive recreation.

4.16.3 Existing Environmental Setting

The City of West Sacramento Parks and Recreation Department coordinates and manages the planning and design of parks, open space, trails, recreation, and community facilities throughout West Sacramento. The City operates 39 parks totaling over 200 acres and maintains more than 52 miles of trails and 790 acres of open space. The City also manages an urban forest with over 30,000 trees. The City classifies parks as community, neighborhood, regional, or pocket parks based on size and characteristics as described below:

- **Community Parks:** Community parks serve neighborhoods and are intended to have a service radius of approximately one to three miles. These parks are generally over 10 acres in size and include a variety of facilities, such as active recreational facilities (e.g., athletic fields and group picnic areas). Bridgeway Lakes Community Park is located approximately 0.20 mile west of the project site. Other community parks in West Sacramento include Alyce Norman Playfield, Bryte Park, Heritage Oaks Park, Memorial Park, and Summerfield Park.

- **Pocket Parks:** Pocket parks are small outdoor spaces, usually less than 0.25 acre but may be up to three acres. They are typically located in urban areas surrounded by commercial buildings or houses. Pocket parks offer minimal amenities on site and are not designed to support programmed activities. The service areas for pocket parks are less than 0.25 mile and intended for users within walking distance. West Sacramento contains numerous pocket parks, including Eagle Point Park, which is approximately 0.40 mile southwest of the project site. Other pocket parks in the city include Circle/Willie Deprato Park, Classics Mini Park, Eagle Point Park, Fred and

Leila Holmes Park, Garden Park, Jerome D. Barry Park, Poquito Park, Redwood Park, Lakeview Park, Kinsington Pocket Park, Rotary Centennial Park, and Union Street Pocket Park.

- **Neighborhood Parks:** Neighborhood parks are typically three to 10 acres in size. Neighborhood parks are often adjacent to schools, greenbelts, open space linkages, or other community open space or recreational facilities to facilitate an integrated open space system. West Sacramento contains numerous neighborhood parks, including Linden Park, which is approximately 1.5 miles northeast of the project site, and Sunset Vista Park, which is approximately 0.5 mile north of the project site. Other neighborhood parks in West Sacramento include Westfield Playground, Westacre Park, Southport Gateway Park, Sam Combs Park, Patwin Park, Meadowdale Park, Elkhorn Park, and Delta Gardens Park.

In addition to the existing City parks and recreation facilities, residents of the City are able to utilize various regional recreation amenities, including:

- **Regional Parks:** Regional parks within West Sacramento include Barge Canal Recreational Access and River Walk Park. Regional parks range between 75 to 1,000 acres, with a service area of three miles or greater.

Areas of open space around the project site include the 14.16-acre Bridgeway Lakes Northeast Park, which borders the project site to the west and includes a large retention basin surrounded by trails.

According to the City of West Sacramento General Plan Parks and Recreation Element, the City determines the need for park space based on its population. The City requires five acres of park space per 1,000 residents. In addition, as of 2019, West Sacramento had 199 acres of park land available to its residents and provided 3.68 acres of park land per 1,000 residents based on the City's 2018 population. Based on the 2025 United States Census population estimates, the City has a current population of approximately 56,216 residents [1] and it provides approximately 3.54 acres of parkland per 1,000 residents,[2] which does not meet the City's parkland objective of five acres per 1,000 residents.

4.16.4 Regulatory Setting

Federal, State, and local regulations and programs related to recreation that are applicable to the proposed project are described below.

4.16.4.1 Federal Regulations

Americans with Disabilities Act. The Americans with Disabilities Act (ADA) of 1990 (42 United States Code [USC] 12181) prohibits discrimination on the basis of disability in public accommodation and State and local government services. Under the ADA, the Architectural and Transportation Barriers Compliance Board issues guidelines to ensure that facilities, public sidewalks, and street crossings

[1] United States Census Bureau. 2025. *QuickFacts: West Sacramento City, California*. Website: https://www.census.gov/quickfacts/westsacramentocitycalifornia (accessed July 16, 2026).

[2] 199 acres/ 56,216 residents × 1,000 = 3.54 acres per 1,000 residents

are accessible to individuals with disabilities. Play areas, meeting rooms, park restrooms, and other buildings and park structures must comply with ADA requirements.

4.16.4.2 State Regulations

Quimby Act. The Quimby Act (California Government Code 66477), enacted in 1966, is a state law, applied at the local level, that specifies the parkland dedication requirements for new residential subdivisions. The Quimby Act authorizes local jurisdictions to require developers of new residential subdivisions to dedicate up to three acres of park area per 1,000 persons or, if the amount of existing neighborhood and community park area exceeds that limit, the jurisdiction can require that existing ratio, not to exceed five acres of land per 1,000 persons, or to pay in-lieu fees for park or recreational purposes. The local jurisdiction must adopt Quimby Act provisions as part of its subdivision ordinance in order to impose the exactions allowed by the act. Alternatively, if the local jurisdiction has Quimby Act standards in its general plan, it can impose park and recreation exactions on subdivisions through the requirement that the subdivision be consistent with the general plan (California Government Code 66474[a]). Although the Quimby Act authorizes the dedication of new parkland, it does not address the development, operation, or maintenance of new park facilities. Therefore, the Quimby Act provides open space needed to develop park and recreational facilities, but does not ensure the development of the land or the provision of a park.

4.16.4.3 Local Regulations

City of West Sacramento Municipal Code. The following chapters of the City Municipal Code related to recreation and park facilities are applicable:

Park Facility Development Fees. Chapter 12.30 of the City's Municipal Code imposes a park development fee as a condition of issuance of all building permits in the city. The City may, at its sole discretion, accept an offer to dedicate land for use as a city park from an applicant in lieu of all or any portion of a parks facilities development fee, when the land is substantially equal in value, as determined by the City, to the fee or portion of the fee imposed upon the applicant. Fees collected pursuant to Chapter 12.30 are used to finance the acquisition, development, renovation, improvement, and replacement of parks and recreational facilities and their development, including equipment for recreational purposes.

Parks and Community Services Facilities. Chapter 12.12 of the City's Municipal Code includes regulations associated with the use of building and park use, fundraising activities, permit procedures, and other provisions related to parks. Park use regulations include a list of activities that require permits for organized activities that involve groups of 50 or more people in a park or 10 or more people in a building for longer than 20 minutes, amplified sound, commercial activities, and fundraising activities. This code also includes a list of prohibited uses within parks, such as unleashed pets, firearms of any type, drinking alcoholic beverages, or contaminating park water features in any way.

City of West Sacramento Bicycle, Pedestrian, and Trails Master Plan (2024 Update). The purpose of the Bicycle, Pedestrian, and Trails Master Plan is to provide well-designed and maintained facilities that promote public use and foster cycling and walking as viable and preferred modes of transportation. The update of this plan provides out a renewed vision of connected bikeways,

walkways, and trails that link together neighborhoods, places of employment, shopping centers, parks, and schools.

City of West Sacramento Parks, Recreation, & Open Space Master Plan (2019). The purpose of the Parks, Recreation, & Open Space Master Plan is to provide a roadmap for future recreational facilities for the City over the next 10 years, consistent with the General Plan 2035 requirements. The plan focuses on identifying the City's current and future recreation needs.

City of West Sacramento General Plan 2035. The Parks and Recreation Element of the City of West Sacramento General Plan 2035 contains the following applicable goals and policies related to recreation:

- **Goal PR-1:** To establish and maintain a public park system and recreation facilities suited to the needs of West Sacramento residents and visitors.
    - **Policy PR-1.1:** The City shall maintain and implement the Parks Master Plan.
    - **Policy PR1.2:** The City shall require new residential development to help meet the City's park acreage as shown in Table PR-1 and established in the adopted Parkland Dedication Ordinance. To this end, the City shall require all new development the dedication of land, dedication of improvements, payment of in-lieu fees, or any combination of these determined acceptable by the City, to the extent authorized by law. Projects located in an area subject to a specific plan may employ alternative strategies to achieve recreation goals.
    - **PR-1.5:** The City shall strive to provide park facilities within convenient walking-distance of all residents.
    - **PR-1.6:** The City shall require that neighborhood parks be integrated into, and be focal points of new residential neighborhoods.

Southport Framework Plan. The Southport Framework Plan was adopted in 1998 to guide the development of Southport. Under the plan, Southport is anticipated to house a population of 42,344 at buildout and proposes providing 293 acres of parkland. The plan provides for neighborhood and community parks, an aquatic center along the Barge Canal, recreation opportunities along the canal system, a community center within the commercial node and recreation/open space opportunities along the Sacramento.

4.16.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the proposed project would have a significant adverse impact with respect to recreation if it would:

Threshold 4.16.1: Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or

Threshold 4.16.2: Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

4.16.6 Project Impacts

Potential impacts to recreation cultural resources are discussed below.

Threshold 4.16.1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less Than Significant Impact. As part of the proposed project, approximately 6.65 acres of open space consisting of a 0.68-acre Central Park, a 0.14-acre parklet, 1.81 acres of landscaped lots, and a 4.02 acre detention basin would be provided for both passive and active recreational use by residents of the development. These recreational and open space areas would also be publicly accessible to West Sacramento residents; however, the 6.65 acres of open space, including the recreational elements of the detention basin, park, and landscaped lots, would be privately owned and maintained by a future Homeowners Association (HOA). Accordingly, the 6.65 acres of open space would not be counted as dedicated public parkland for purposes of the City's parkland inventory. The recreational facilities included as part of the proposed project are not included in the City's parks master plan and no City parks are planned for the project site.

In addition, landscaping, roadway, and utility improvements would be installed within the project site. As described in Section 4.14, Population and Housing, and based on the city average of 2.8 persons per household, development of the proposed project is expected to result in approximately 725 new residents.[3] These new residents would use public parks and recreational facilities in the surrounding area, including those within the city. The City's Parks, Recreation and Open Space Master Plan,[4] states a goal of providing five acres of land per 1,000 residents for park and recreational purposes. As of 2019, the City had 199 acres of park land available to its residents and provided 3.68 acres of park land per 1,000 residents based on the City's 2018 population. Currently, the City has a population of 56,216 residents [5] and it provides approximately 3.54 acres of parkland per 1,000 residents,[6] which does not meet the City's parkland objective of five acres per 1,000 residents. With the addition of 725 new residents from the proposed project, the total

[3] 259 households x 2.8 persons per household = 725 persons

[4] City of West Sacramento. 2019. *Parks, Recreation & Open Space Master Plan.* Website: https://www.cityofwestsacramento.org/home/showpublisheddocument/10072/637121797939770000 (accessed February 2026).

[5] United States Census Bureau. 2025. *West Sacramento City, California* QuickFacts. Website: https://www.census.gov/quickfacts/fact/table/westsacramentocitycalifornia/PST045224 (accessed July 16, 2026).

[6] 199 acres/ 56,216 residents × 1,000 = 3.54 acres per 1,000 residents

population would increase to approximately 56, 941,[7] and the City's parkland ratio would decrease slightly to 3.49 acres per 1,000 residents, which also remains below the City's goal.[8]

As specified in Chapter 12.30 of the City's Municipal Code, the City imposes a park development fee as a condition of issuance of all building permits in the city. Section 12.30.020 of the City's Municipal Code states the City may, in its sole discretion, accept from an applicant for a building permit an offer to dedicate land for use as a city park from an applicant in lieu of all or any portion of a parks facilities development fee, when the land is substantially equal in value, as determined by the City, to the fee or portion of the fee imposed upon the applicant.

As discussed in Section 4.14, Population and Housing, the proposed project is consistent with the City's Regional Housing Needs Allocation (RHNA), and the Sacramento Area Council of Governments (SACOG) population projections and residents of the proposed project are expected to come from the city and surrounding area. It is expected that residents of the proposed project would utilize the proposed parkland and recreational facilities associated with the proposed project due to proximity to their residences. Therefore, the proposed project would not substantially increase the use of existing neighborhood and regional parks or other recreational facilities in either the City such that substantial physical deterioration of the facility would occur or be accelerated.

In addition, as noted above, the City would require a parks facilities development fee for all building permits in the City (see **Regulatory Compliance Measure PS-4** as detailed in Section 4.15, Public Services). Implementation of the proposed project would not worsen the City's existing parkland to resident ratio from existing conditions. Furthermore, consistent with Chapter 12.30 of the City's Municipal Code, the Project Applicant would be required to pay applicable park fees, as specified in **Regulatory Compliance Measure PS-4.** Therefore, the proposed project's impact to parks and recreational facilities would be **less than significant**, and no mitigation is required.

Threshold 4.16.2: Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact. As stated above under Threshold 4.16.1, the proposed project would include approximately 6.65 acres of open space consisting of a 0.68-acre Central Park, a 0.14-acre parklet, 1.81 acres of landscaped lots, and a 4.02-acre detention basin would be provided for both passive and active recreational uses by residents of the development. Individual open space components are discussed below.

[7] 56,216 current 2025 population + 725 residents from the proposed project = 56,941 residents

[8] 199 acres/56 941 (total population including the additional 725 residents) x 1,000 = 3.49 acres per 1,000 residents

- **Central Park.** The 0.68-acre Central Park would be designed as a large community space with a walkway leading to a fountain and a large community shade structure intended for social gatherings, farmers markets, and community events.

- **Parklet.** The proposed project would include a 0.14-acre parklet that would be comprised of green space and a small gathering area in the northeast corner of the project site, adjacent to a proposed roundabout at the corner of Marshall Road and Otis Avenue. The parklet would include entry monumentation signage and trellis, walkways, benches, and/or turf area. Associated landscaping would also be included within the proposed parklet.

- **Landscaped Lots.** The proposed project would include 1.81 acres of landscaped lots, which would be dedicated as open space. These landscaped lots would contain trees, benches, and walkways. These lots would typically be placed next to the corner lots throughout the villages, along Main Avenue.

- **Detention Basin.** The 4.02-acre detention basin would serve as both a stormwater detention facility and a seasonal recreational area, designed to collect and manage runoff during wet seasons while providing functional greenspace during dry months. The basin would include post and cable fencing around the perimeter, signage, and associated landscaping. The Reclamation District No. 900 (RD 900) will maintain the stormwater and drainage components of the detention basin and said maintenance will be funded by RD 900 property assessments and to RD 900's standards.

These recreational and open space areas would also be publicly accessible to West Sacramento residents; however, the 6.65 acres of open space, including the recreational elements of the detention basin, park, and landscaped lots, would be privately owned and maintained by a future HOA. Accordingly, the 6.65 acres of open space would not be counted as dedicated public parkland for purposes of the City's parkland inventory. In addition, the proposed project does not include the development or expansion of any off-site recreational facilities; therefore, no off-site effect on the environment would occur.

Although the project is anticipated to add approximately 725 new residents to the City, as described above under Threshold 4.16.1, it is not expected to result in the need for new or expanded recreational facilities outside of the facilities included in the project. The proposed project is well-served by a range of existing parks and recreational resources, both locally within the City and regionally through access to nearby county and open space amenities. Given the availability and distribution of these facilities, as well as the City's existing park planning framework and service standards, the increase in population would not necessitate the construction of new parks or recreational infrastructure and thus would not have an adverse physical effect on the environment. Accordingly, potential impacts would be **less than significant**, and no mitigation is required.

4.16.7 Cumulative Impacts

Less Than Significant Impact. As defined in Section 15355(b) of the *State CEQA Guidelines*, cumulative impacts refer to the incremental impacts of the project added to other closely related past, present, and reasonably foreseeable probable future projects. The cumulative geographic study area for parks and recreation is the City, as parks and recreational facilities are generally owned and maintained by individual municipalities, though it is possible residents of the City utilize County-owned recreational facilities or recreational facilities located in other cities. The cumulative project list is provided in Chapter 4.0, **Table 4.A**, and a map of cumulative project locations is provided in Chapter 4.0, **Figure 4-1**.

As detailed in Section 4.14, Population and Housing, implementation of the proposed project in conjunction with the 26 cumulative projects identified in **Table 4.A** would contribute to an increase in population and housing growth in the City. Upon full buildout of these cumulative projects, it is estimated that approximately 11,109 residential units would be constructed, generating 31,105 new residents (based on the City's average household size of 2.8 persons). The proposed project would add approximately 725 residents, resulting in a cumulative population increase of approximately 31,830 residents resulting in an overall increase of 88,046 residents. The population growth from the proposed project and cumulative development would be consistent with the City's Housing Element and the SACOG MTP/SCS forecasted growth.

As described under Threshold 4.16.1, the proposed project would include approximately 6.65 acres of open space consisting of a 0.68-acre Central Park, a 0.14-acre parklet, 1.81 acres of landscaped lots, and a 4.02-acre detention basin would be provided for both passive and active recreational uses by residents of the development. These recreational and open space areas would also be publicly accessible to West Sacramento residents; however, the 6.65 acres of open space, including the recreational elements of the detention basin, park, and landscaped lots, would be privately owned and maintained by a future HOA. Accordingly, the 6.65 acres of open space would not be counted as dedicated public parkland for purposes of the City's parkland inventory.

Upon completion of the proposed project, it is assumed that the 725 new residents would primarily use the on-site recreational amenities and parks and therefore would not substantially increase the use of other recreation facilities within the City. In addition, as stated above, the 26 cumulative projects, in conjunction with the proposed project, would increase the City's overall population by approximately 31,830 residents, resulting in a total population of 88,046 residents. As a result, the City's overall parkland ratio would decrease to approximately 2.26 acres per 1,000 residents,[9] which would remain well below the City's goal of five acres per 1,000 residents. However, all new development in the City, including the proposed project, is required to comply with Chapter 12.30 of the City's Municipal Code, which requires Project Applicant(s) to either dedicate parkland or pay development impact fees to support the provision of future park and recreational facilities, as outlined in **Regulatory Compliance Measure PS-4.** Furthermore, each cumulative project would be

[9] 199 acres / 88,046 (existing population plus 31,830 projected population from cumulative projects and the proposed project) x 1,000 = 2.26 acres per 1,000 residents

evaluated individually, and some may include new parks or recreational facilities that would add parkland or amenities to the City's overall park system.

Therefore, with compliance with Chapter 12.30 of the City's Municipal Code, the cumulative impact of the proposed project and other related development would be **less than significant**. Additionally, the proposed project's contribution to park and recreational facilities would not be cumulatively considerable.

4.16.8 Level of Significance Prior to Mitigation

The proposed project would result in less than significant impacts related to recreation.

4.16.9 Mitigation Measures

4.16.9.1 Regulatory Compliance Measure

The proposed project would be required to comply with the standards set forth in **Regulatory Compliance Measure PS-4**, as detailed in Section 4.15, Public Services, which is intended to reduce impacts related to recreation.

4.16.9.2 Mitigation Measures

The proposed project would not result in potentially significant impacts related to recreation, and no mitigation is required.

4.16.10 Level of Significance after Mitigation

The proposed project would result in less than significant impacts related to recreation.

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4.17 TRANSPORTATION

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for the proposed Brar Farms Residential Development Project (proposed project) to impact recreation in the City of West Sacramento (City). The analysis contained in this section is based on the Transportation Study prepared by Linscott, Law & Greenspan, Engineers (LLG),[1] the supplemental Marshall and Higgins *Public Safety and Traffic Calming Project Memorandum* (Traffic Calming Memorandum) prepared by the City,[2] and the Cumulative Transportation Study prepared by LSA Associates Inc. (LSA).[3] Each of these documents are provided in **Appendix I** in this Draft EIR. This section also incorporates information from the City of West Sacramento General Plan Mobility Element, the City's Mobility Action Plan (MAP), the City's Southport Framework Plan,[4] the City's Evacuation Planning and Response Memorandum.

4.17.1 Scoping Process

Several comments addressed transportation and traffic. These comments raised concerns about traffic congestion at key intersections, unsafe pedestrian and bicycle conditions, evacuation constraints during emergencies, and cumulative increases in vehicle miles traveled (VMT).

4.17.2 Methodology

The analysis of potential impacts to transportation and traffic is based on the site-specific Transportation Study, the supplemental Traffic Calming Memorandum, and the Cumulative Transportation Study completed for the proposed project (**Appendix I**). The Transportation Study and the Cumulative Transportation Study conform to the objectives and methodologies set forth in the General Plan Mobility Element, and applicable provisions of the California Environmental Quality Act (CEQA). The project study area, and methodology, were determined through coordination with the City, prior to the preparation of the Transportation Study. In addition, cumulative conditions includes land use growth and transportation network updates associated with the City's General Plan buildout, which incorporated coordination with the City prior to the preparation of the Cumulative Transportation Study.

4.17.2.1 Trip Generation

The trip generation for the proposed project was developed using rates from the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (2021)[5] for Land Use Code Land Use Code 210 (Single-Family Detached Housing).

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1 Linscott, Law & Greenspan, Engineers (LLG). 2026. *Transportation Study.* 3425 Marshall Road Residential, City of West Sacramento, CA. May 14.

2 City of West Sacramento. 2024. *Marshall & Higgins Public Safety and Traffic Calming Project – Existing Traffic Operations and Proposed Traffic Control Modifications.* January 29.

3 LSA Associates, Inc. (LSA). 2026. *Transportation Study. Brar Farms Residential Development Project*. July.

4 City of West Sacramento. 1994. *Draft Environmental Impact Report for the Southport Framework Plan. Master Development Plan SCH #91063032.* March.

5 Institute of Transportation Engineers (ITE). 2021. *Trip Generation Manual,* 11th Edition.

4.17.2.2 Vehicle Miles Traveled

Until July 1, 2020, roadway congestion or level of service (LOS) was used as the primary study metric for planning and environmental review of development projects in California. However, Senate Bill (SB) 743 required the Governor's Office of Land Use and Climate Innovation (LCI, formerly the Office of Planning and Research) to establish a new metric for identifying and mitigating transportation impacts pursuant to CEQA to meet the State's goals to reduce greenhouse gas (GHG) emissions, encourage infill development, and improve public health through more active transportation.

Public Resources Code (PRC) Section 21099(b) states that, upon certification of the revised guidelines for determining transportation impacts, automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment under CEQA. On July 1, 2020, LCI identified vehicle miles traveled (VMT) as the required CEQA transportation metric (not LOS) and is the only legally acceptable threshold for transportation-related environmental impacts pursuant to CEQA.

VMT is a measurement of the amount and distance that a person drives, accounting for the number of passengers within a vehicle. Many interdependent factors affect the extent and distance a person might drive. In particular, the type of built environment affects how many places a person can access within a given distance, time, and cost, using different ways of travel (e.g., private vehicle, public transit, bicycling, walking). Typically, low-density development located at great distances from other complimentary land uses and in areas with few alternatives to the private vehicle provides less access than a location with high density, a mix of land uses, and numerous ways of travel. Therefore, low-density development typically generates more VMT per capita compared to a similarly sized development located in urban areas. In general, higher VMT areas are associated with more air pollution, including GHG emissions and energy usage, than lower VMT areas. VMT is calculated by multiplying the number of vehicle trips generated by a project by the total distance of each of those trips.

While the City of West Sacramento has not formally adopted its own VMT screening guidelines or thresholds, it relies on the VMT screening guidelines included in the *Technical Advisory on Evaluating Transportation Impacts in CEQA* developed by LCI (Technical Advisory).[6] These guidelines identify when a proposed land use project is anticipated to result in a less than significant impact without conducting a more detailed VMT analysis. A land use project needs only to meet one of the below screening criteria to have a presumption of less than significance:

- *Low Trip Generator Screening (Small Projects)*: Based on the LCI Technical Advisory, projects generating fewer than 110 daily trips may be screened out from a detailed VMT analysis. As detailed in the analysis below, the proposed project includes 259 single-family dwelling units on a site with the potential to generate 2,422 daily trips. Therefore, this VMT screening criterion does not apply to the proposed project.

[6] Governor's Office of Land Use and Climate Innovation (LCI), formerly the Governor's Office of Planning and Research (OPR). 2018. *Technical Advisory on Evaluating Transportation Impacts in CEQA*. December 2018. Website: https://www.lci.ca.gov/wp-content/uploads/20190122-743_Technical_Advisory.pdf (accessed June 14, 2026).

- *Project Located in Low VMT Area*: Traditional residential or office projects can be screened out from a detailed VMT analysis if located in a low VMT area because new development would result in similar level of VMT. As part of this screening evaluation, the project location was examined in the Sacramento Area Council of Governments' (SACOG) Senate Bill 743 Regional VMT Project Screening Maps, Household-Generated VMT from the City's General Plan Mobility Element to determine if the project was located within a low VMT area. For residential projects, the threshold is 85 percent less than the regional average. Based on SACOG's SB 743 Regional VMT Project Screening Map (residential VMT) and the City's General Plan map, the proposed project would have an average residential VMT per Capita higher than 85 percent of the regional average. Therefore, this VMT screening criterion does not apply to the proposed project.

- *Transit Priority Area (TPA) Screening.* Projects within one-half mile of an existing or planned major transit stop or an existing stop along a high-quality transit corridor may be screened from a detailed VMT analysis because they are expected to generate lower VMT due to their proximity to transit. According to SACOG, projects within TPAs refer to an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon of the MTP/SCS. A major transit stop pursuant to PRC Section 21064.3, is defined as a site containing a rail transit station or bus rapid transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.[7] Based on SACOG's TPA map, the proposed project is not located within a TPA. Therefore, this VMT screening criterion does not apply to the proposed project.

- *Affordable Residential Development.* Projects consisting of a high percentage of affordable housing may be screened out from a detailed VMT analysis and presumed to result in a less than significant transportation impact because they can improve jobs-housing balance and typically generate lower VMT than market-rate housing. The proposed project does not include an affordable housing component. Therefore, this VMT screening criterion does not apply to the proposed project.

- *Redevelopment Projects.* If a proposed redevelopment project leads to a net overall decrease in VMT (when compared against the VMT of the existing land uses), the project may be screened out from detailed VMT analysis and presumed to result in a less than significant transportation impact. As the proposed project consists of new single-family homes located on a vacant parcel, the project would not qualify as a redevelopment project. Therefore, this VMT screening criterion does not apply to the proposed project.

- *Local Serving Retail.* Trip lengths may be shortened and VMT reduced by adding "local-serving" retail opportunities that improve retail destination proximity. The Technical Advisory generally describes retail development including stores less than 50,000 square feet as locally serving. The proposed project could not be classified as "local-serving" as the proposed project would not

[7] Sacramento Area Council of Governments (SACOG). 2026. *SB 743 Transit Priority Areas SACOG.* Website: https://sb743-sacog.opendata.arcgis.com/datasets/SACOG: sb-743-transit-priority-areas-sacog-1/explore?location=38.530932%2C-121.571553%2C16 (accessed June 14, 2026).

include retail or commercial uses, institutional or government uses, or public service uses, this screening criterion does not apply to the project.

As discussed above, the proposed project could not be screened out from detailed VMT analysis. Accordingly, pursuant to LCI, a detailed VMT analysis is required to assess the project's VMT impact. A detailed VMT analysis is provided below in Section 4.17.6, Project Impact.

VMT Threshold of Significance for Residential Land Uses. As described above, the proposed project is a residential land use and does not qualify for any of the screening criteria identified in the LCI's Technical Advisory. Therefore, project-generated VMT is compared to the applicable regional average to determine the significance of transportation impacts. Consistent with LCI guidance, a residential project is considered to result in a significant transportation impact if it generates VMT per capita that exceeds 85 percent of the applicable regional average.

Based on the detailed VMT analysis conducted in the Cumulative Transportation Study, the existing average VMT per capita is 20.50 for the SACOG region. Accordingly, the significance thresholds are defined as 85 percent of this value, or 17.43 VMT per capita for the SACOG region.

VMT Modeling. Potential VMT impacts associated with the proposed project were analyzed using the Enterprise Crossing travel demand model, to evaluate project specific and cumulative VMT conditions. This model is a refined version of SACOG's SACSIM23 travel demand model and was developed to support transportation analysis for the City's Enterprise Crossing/Enterprise Bridge project. This model also incorporates refinements including updates to Transportation Analysis Zone (TAZ) boundaries, the roadway network, and land use growth assumptions. The model includes a base year of 2023 and a future year of 2050, accounting for planned growth within the City expected with General Plan buildout, including development associated with the proposed project as well as other cumulative residential projects such as the Yarbrough, Liberty, and River Park Master Plans.

4.17.3 Existing Environmental Setting

4.17.3.1 Existing Circulation System

Key roadways in the vicinity of the proposed project are as follows:

- **Marshall Road** is classified as a collector in the City's General Plan Mobility Element. It is currently constructed as a two-lane undivided roadway. The posted speed limit is 35 mph. On-street parking is not permitted along the street segment

- **Southport Parkway** is functionally classified as a major arterial in the City's General Plan Mobility Element. Southport Parkway is currently constructed as a two-lane divided roadway with intermittent left-turn lanes (south of Marshall Road) and opens to a four-lane divided roadway with intermittent left-turn lanes (north of Marshall Road). The posted speed limit ranges from 35 to 45 mph. On-street parking is not permitted along the street segment.

- **Otis Avenue** is functionally classified as a collector in the City's General Plan Mobility Element. Otis Avenue is currently constructed as a two-lane, undivided roadway with a posted speed limit of 25 mph. On-street parking is not permitted along the street segment.

- **Jefferson Boulevard** is functionally classified as a major arterial from Southport Parkway to Davis Road and as a minor arterial from Davis Road to Linden Road in the City's General Plan Mobility Element. It is currently constructed as a two-lane undivided roadway with intermittent left turn lanes. The posted speed limit is 45 mph. On-street parking is not permitted along the street segment.

Local vehicular access to the project site is provided by way of Jefferson Boulevard, Marshall Road, and Southport Parkway. Regional vehicular access to the project site is provided by Interstate 5 (I-5), and Interstate 80 (I-80), which are located to the east and north of the project site, respectively. The nearest freeway access is primarily via U.S. Route 50 (US-50), located north of the project site, which provides a direct connection to I-5 for north-south travel. The Harbor Boulevard interchange, approximately 2.9 miles north, also provides freeway access.

4.17.3.2 Existing Transit System

The study area is serviced by the Yolo County Transportation District via Local Bus Route 37, which operates in a clockwise loop through Marshall Road, Southport Parkway, and Jefferson Boulevard, connecting the Southport area of West Sacramento to Downtown Sacramento. Route 37 operates on weekdays only, with service beginning at approximately 5:29 a.m. and ending around 6:24 p.m., and buses running approximately hourly throughout the day. Route 37 includes 44 stops, beginning and ending at Southport Parkway at Promenade, and serves key destinations such as the West Sacramento Transit Center, Sutter Health Park, and Downtown Sacramento locations including Capitol Mall and J Street. Within the study area, the following bus stops are provided along Marshall Road: the northwest corner of the Marshall Road/Rivermont Street/Allan Drive intersection (a timepoint-scheduled stop), the northwest corner of Marshall Road/Seymour Avenue, and the northeast corner of Marshall Road/Southport Parkway. These stops are located approximately 0.54 mile west, 0.26 mile west, and 0.25 mile northeast of the project site, respectively.

In addition, in 2018 the City of West Sacramento partnered with Via to implement an on-demand rideshare program that provides residents, employees, and visitors with flexible transportation service throughout West Sacramento and to select destinations in Downtown Sacramento. Via operates seven days per week and serves as an on-demand transit option which also provides wheel chair accessible vehicles.[8] Via would also be available to residents at the project site.

Transit facilities are accessible via sidewalks along Marshall Road, Southport Parkway, and Jefferson Boulevard, providing pedestrian connectivity to nearby bus stops. However, there is no transit service provided south of Southport Parkway and south of Jefferson Boulevard.

4.17.3.3 Existing Bicycle and Pedestrian System

Within the study area, Class II bikeways (bike lanes) are currently provided along Marshall Road, Southport Parkway, Otis Avenue, Golden Gate Drive, and Jefferson Boulevard north of Harmon Road. According to the City's Bicycle, Pedestrian, and Trails Master Plan,[9] future bicycle facilities

[8] City of West Sacramento. 2025.Via Rideshare (On-Demand Rideshare Program. Website: https://www.cityofwestsacramento.org/services/via-rideshare (accessed July 14, 2026).

[9] City of West Sacramento. 2024. *Bicycle, Pedestrian, and Trails Master Plan Update.*

within the study area include a proposed Class I bikeway (shared-use path) along the Main Canal south of Marshall Road and a proposed Class II bikeway (bike lane) along Jefferson Boulevard south of Harmon Road.

Additionally, within the vicinity of the project site, continuous sidewalks are currently provided along the north side of Marshall Road and along both sides of Southport Parkway and Golden Gate Drive. The proposed project would also include frontage improvements consisting of new sidewalks along the project's frontage on the south side of Marshall Road and along Otis Avenue.

4.17.4 Regulatory Setting

Federal, State, and local regulations and programs related to transportation and traffic that are applicable to the proposed project are described below.

4.17.4.1 Federal Regulations

There are no federal regulations that apply to the proposed project with respect to transportation and traffic.

4.17.4.2 State Regulations

Senate Bill 743. SB 743 was signed in 2013, with the intent to "more appropriately balance the needs of congestion management with Statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions." SB 743 changes the focus of the transportation impact discussion within CEQA environmental review analyses from measuring impacts to drivers, to measuring the impact of driving on the environment. The change is made by replacing the historically and commonly utilized LOS metric with an analysis of VMT. This shift in applicable metrics is expected to better align transportation impact analysis and mitigation outcomes with the State's goals to reduce GHG emissions, encourage infill development, and improve public health through more active transportation. When implemented, "traffic congestion shall not be considered a significant impact on the environment" within a CEQA transportation environmental analysis.

After an extensive public review period, in late 2018, updates to the *State CEQA Guidelines* were finalized and adopted. These changes became effective on December 28, 2018. The updated *State CEQA Guidelines* address the requirements of SB 743 and require lead agencies to assess VMT impacts for projects in Section 15064.3. The updated *State CEQA Guidelines* indicate that "a development project that is not exempt and that results in VMT greater than regional average for the land use type may indicate a significant impact." Mandatory implementation of the VMT metric and application of Section 15064.3 was required to by July 2020, pursuant to the applicable *State CEQA Guidelines*.

4.17.4.3 Regional Regulations

Sacramento Area Council of Governments. The Sacramento Area Council of Governments (SACOG) is the federally designated Metropolitan Planning Organization (MPO) for the Sacramento region and prepares the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) in coordination with 22 cities and six counties. The MTP/SCS is a long-range regional plan, with a

planning horizon of approximately 20 years, that must be updated every four years in accordance with federal requirements The 2025 Blueprint, adopted on November 20, 2025, is SACOG's current MTP/SCS and serves as the region's comprehensive framework for integrating land use and transportation planning. The plan identifies transportation investments across all modes, including roadway, transit, bicycle, and pedestrian facilities, and coordinates future growth in housing and employment to support a sustainable, equitable, and economically prosperous region. The MTP identifies goals and policies related to land use and transportation in the Sacramento region. The following goals are applicable to the proposed project:

- **Goal 1:** Build vibrant places for today's and tomorrow's residents.
- **Goal 2:** Foster the next generation of mobility solutions.
- **Goal 4:** Build and maintain a safe, reliable, and multimodal transportation system.

4.17.4.4 Local Regulations

City of West Sacramento Municipal Code. Guidelines and provisions related to traffic and circulation are addressed in Title 12 (Vehicles and Traffic) of the City's Municipal Code.

City of West Sacramento General Plan 2035. The General Plan Mobility Element outlines the City's goals and implementation policies to support a connected, efficient, multi-model system that facilitates the community's economic, environmental, and social objectives. The Mobility Element contains policies to support increased densities and a mix of uses in multi-modal districts, to help walking become more practical, to support bicycling for both short- and long-distance trips, and to improve transit frequency and destination options. The General Plan Mobility Element outlines the following goals that would apply to the proposed project:

- **Goal M-1:** To develop and maintain a multi-modal integrated transportation system that provides for the safe and efficient movement of people and goods, supports vibrant neighborhoods and business districts, and reduces air pollution and greenhouse gas (GHG) emissions from VMT.

- **Goal M-2**: To provide complete streets that accommodate driving, walking, bicycling, and public transit and are designed to enable safe, attractive, and comfortable access and travel for all users.

- **Goal M-3**: To develop and maintain a street and highway system that promotes safe, efficient, and reliable movement of people and goods by multiple transportation modes and routes, reduces air quality impacts and GHG emissions, and minimizes traffic noise impacts.

    - **Policy M-3.2: Vehicular Level of Service.** For planning purposes, the City shall endeavor to maintain a vehicular Level of Service "C" on all streets within the City, except at intersections and on roadway segments within one-quarter mile of a freeway interchange or bridge crossing of the Deep Water Ship Channel, barge canal, or Sacramento River, where a Level of Service "D" shall be deemed acceptable, and within pedestrian oriented, high-density, mixed-use areas, such as the Pioneer Bluff and Stone Lock Reuse Master Plan area, Bridge District Specific Plan area, Washington District Specific Plan area, and Sacramento

Avenue and West Capitol Avenue corridors east of Harbor Boulevard, where a vehicular Level of Service "E" shall be deemed acceptable.

- **Goal M-4**: To support and maintain a range of public and private transit systems that are responsive to the needs of all residents and employees and allow efficient and safe travel throughout the city and region.

- **Goal M-5:** To develop and maintain a safe, comprehensive, and integrated bicycle system and bicycle support facilities throughout the city.

- **Goal M-6**: Develop and maintain a safe, accessible, and integrated pedestrian system that promotes walking.

- **Goal M-7**: To develop and manage both on- and off-street parking systems that balance citywide goals of economic development, livable neighborhoods, and public safety.

- **Goal M-8**: To use Transportation Demand Management as a means to improve system efficiency and reduce dependence on motor vehicles and traffic congestion, and expand travel options and choices.

West Sacramento Bicycle, Pedestrian, and Trails Master Plan (2024 Update). The City of West Sacramento Bicycle and Pedestrian Path Master Plan provides the objectives and policies related to the development of a system of public bicycle and pedestrian paths within the City. The following policies would apply to the proposed project:

- A continuous network of low-stress bikeways between residential areas and key destinations.

- A continuous and interconnected system of bikeways and walkways that provide safe and convenient travel to key destinations.

- New development providing bicycle- and pedestrian-friendly on-site circulation and access.

City of West Sacramento Draft Climate Action and Adaption Plan (CAAP). The City's CAAP was adopted by the City Council on June 4, 2025.[10] The Final CAAP includes policies and strategies to reduce community and municipal GHG emissions. It builds upon the City's long-term planning vision for the future established in the City's 2035 General Plan. In addition, the CAAP describes development of the City's 2030 and 2045 reduction targets, detailing their consistency with State legislation and executive orders and establishes that meeting the reduction targets would avoid cumulatively considerable effects. As such, the CAAP was developed consistent with state guidelines that pertain to local plans "for the reduction or mitigation of GHG emissions" (pursuant to SB 97 and

[10] City of West Sacramento. 2025. *City of West Sacramento Climate Action and Adaptation Plan*. June 4. Website: https://www.cityofwestsacramento.org/home/showpublisheddocument/20579/638860179110630000 (accessed May 2026).

State CEQA Guidelines Section 15183.5), allowing the City to use the CAAP rather than project-level analysis for GHG emissions impact assessment for future projects.

4.17.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the proposed project may have a significant adverse impact with respect to transportation and traffic if it would:

Threshold 4.17.1: Conflict with program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;

Threshold 4.17.2: Conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b);

Threshold 4.17.3: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or

Threshold 4.17.4: Result in inadequate emergency access.

4.17.6 Project Impacts

Please refer to Section 4.17.9 for full text description of the regulatory compliance and/or mitigation measures referenced in the analysis below.

Threshold 4.17.1: Would the project conflict with program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less Than Significant Impact. This section discusses the proposed project's impacts related to conflicts with applicable plans, ordinances, and policies related to transportation. As discussed in more detail below, the proposed project would be consistent with applicable plans, ordinances, and policies that address the circulation system.

Roadway Facilities. Ingress and egress to the project site would be provided via four full-access driveways: two located off Marshall Road, one at Martinique Street and one at Jamaica Street, and two located off Otis Avenue. The proposed project would also construct several public streets to facilitate circulation throughout the proposed residential development.

In the northern portion of the project site, Main Avenue, which runs north-south, would serve as a primary street linking Marshall Road to Otis Avenue, by way of Street D, while providing direct access to Streets C and D. Street C would connect to Streets A and B, and Street D would connect to Streets B, E, F, and G. Main Avenue would also include the installation of a traffic circle at Main Avenue and Street D. In the southern portion of the project site, Street I would connect to Streets B and E and Street H would connect to Streets F and G. In the southern portion of the project site,

Streets F and D would also serve as primary streets providing access to Otis Avenue, Main Avenue, Street C, and Street H.[11]

Construction activities associated with the proposed project would result in an increase in traffic on local roadways during the construction period due to heavy equipment transport to and from the site, arrival and departure of construction workers, and import/export of construction material; however, traffic associated with construction would be short-term and temporary.

LOS is no longer an accepted metric for identifying traffic impacts under CEQA. However, the City's General Plan Mobility Element, includes policies addressing LOS, including a policy to maintain a vehicular Level of Service C on all streets within the City, except at intersections and on roadway segments within one-quarter mile of a freeway interchange or bridge crossing of the Deep Water Ship Channel, barge canal, or Sacramento River, where a Level of Service D is deemed acceptable. Further discussion on LOS is included in **Appendix I**.

Bicycle and Pedestrian System. As discussed in the Transportation Study, the existing Class II bicycle facilities (i.e., bike lanes) along Marshall Road and Otis Avenue, along with the proposed frontage improvements, including new sidewalks, curb and gutter infrastructure, undergrounding of overhead utilities, street lighting, and landscaping, would not disrupt or interfere with bicycle travel. The proposed streets would have approximately 50 to 60 feet of cross-section right-of-way, which would accommodate 5- to 8-foot-wide sidewalks, landscaped strips between the curb and sidewalk, Class III bikeways within the proposed development, Class II bikeways along Marshall Road and Otis Avenue, and enhanced crosswalks with speed tables and bulb-outs. Although on-street parking would be available for residents and guests, this would not affect bicycle travel**.**

According to SACOG, regionwide per-capita weekday trips for all travel purposes were 0.08 for bicycling and 0.35 for walking in 2020, with projected increases to 0.09 and 0.35, respectively, by 2050.[12] Locally, American Community Survey (ACS) 2023 data indicates that approximately 3.4 percent of commute trips in West Sacramento are by bicycle and 2.9 percent are by walking. These ACS estimates reflect commute trips only and do not capture non-work trips such as school, errands, or recreation; therefore, the following project trip estimates are conservative.

According to the U.S. Census Bureau,[13] bicycle trips comprise approximately 3.4 percent of the total commute mode share in West Sacramento, and pedestrian trips comprise of approximately 2.9 percent. As stated in Section 4.14-7, Population and Housing, the proposed project would involve

[11] The street names identified in this EIR as part of the proposed project are temporary names used for site planning purposes. The permanent street names will be determined during the final design and development of the proposed project.

[12] Sacramento Area Council of Governments (SACOG). 2025. *2025 Blueprint Plan.* Appendix E. Plan Performance. Website: https://www.sacog.org/home/showpublisheddocument/3305/638975101163898400 (accessed June 17, 2026).

[13] United States Census Bureau. 2023. American Community Survey (ACS) 5-years Estimates Detailed tables. Table B08134. Means of Transportation to Work by Travel Time to Work. Website: https://data.census.gov/table/ACSDT5Y2023.B08134?q=B08134:+Means+of+&g=160XX00US0684816 (accessed September 11, 2025).

the subdivision of an approximately 60-acre property to create 259 lots for future single-family homes and result in a net increase of approximately 725 residents.[14] Although the proposed project would generate additional bicycle and pedestrian traffic in the area, given the addition of 725 additional residents it is assumed that the proposed project would not generate a significant increase in pedestrian and bicycle traffic in the area in comparison to the existing volumes, given the size and nature of the proposed project. Using the SACOG per-capita weekday trip rates for all travel purposes, 0.08 Weekday Person Trips by Bicycle and 0.35 Weekday Person Trips by Walk, the project is estimated to generate approximately 58[15] bicycle trips per day and 254[16] pedestrian trips per day. Accordingly, existing bicycle facilities, sidewalks, and nearby crosswalks would have sufficient capacity to accommodate project-generated bicycle and pedestrian demand, and the project would not substantially impair the operation of these facilities.

Additionally, Goal M-1 of the City's General Plan Mobility Element, "To develop and maintain a multi-modal integrated transportation system that provides for the safe and efficient movement of people and goods, supports vibrant neighborhoods and business districts, and reduces air pollution and greenhouse gas emissions from VMT," would be supported by the proposed project's internal street network and connections to Marshall Road and Otis Avenue, which would maintain safe and efficient movement for all modes. Goal M-2, "To provide complete streets that accommodate driving, walking, bicycling, and public transit and are designed to enable safe, attractive, and comfortable access and travel for all users," would be supported through the inclusion of sidewalks, landscaped strips, and Class II and Class III bikeways, which would provide safe and accessible facilities for all users. Goal M-5, "To develop and maintain a safe, comprehensive, and integrated bicycle system and bicycle support facilities throughout the city," would be supported by the extension of Class III bikeways within the development and connections to existing Class II bikeways along Marshall Road and Otis Avenue. Goal M-6, "To develop and maintain a safe, accessible, and integrated pedestrian system that promotes walking," would be consistent with the project's provision of sidewalks, enhanced crosswalks, and pedestrian-friendly streets, which safely accommodate the projected pedestrian volumes. Therefore, the proposed project's circulation design would be consistent with the City's Mobility Element goals, for bicycle and pedestrian facilities. Additionally, as detailed in Section 4.8, Greenhouse Gas Emissions, the proposed project is consistent with applicable goals and actions of the City of West Sacramento's CAAP. The installation of two new sidewalks, one along Marshall Road and another along Otis Avenue, would encourage non-vehicular travel for recreational purposes.

The proposed project would not change the design of any existing bicycle or pedestrian facilities nor create any new safety problems for bicycles or pedestrians in the area. While the proposed project would increase potential bicyclists and pedestrians in the general area, the estimated volumes added would not significantly impact any existing facilities. Accordingly, the proposed project would not cause substantial changes to the bicycle or pedestrian traffic in the area and would not significantly impact the design of any existing bicycle or pedestrian facilities. Impacts to pedestrian facilities would therefore be **less than significant**.

14 259 households × 2.8 persons per household = 725 persons

15 (725 persons × 0.08 weekday bicycle trips/person/day = 58 bicycle trips/day)

16 (730 persons × 0.35 weekday pedestrian trips/person/day = 253.75 ≈ 254 pedestrian trips/day)

Transit Services. As stated above in Section 4.17.6, Existing Transportation and Circulation System, bus service to the project site would be provided by the Yolo County Transportation District via Local Bus Route 37 by the YOLOBUS. The nearest bus stops are provided along Marshall Road: the northwest corner of Marshall Road/Rivermont Street/Allan Drive intersection (a timepoint-scheduled stop), the northwest corner of Marshall Road/Seymour Avenue, and the northeast corner of Marshall Road/Southport Parkway. Transit facilities are currently accessible via sidewalks along Marshall Road, Southport Parkway, and Jefferson Boulevard, providing pedestrian connectivity to nearby bus stops. However, there is no transit service provided south of Southport Parkway and south of Jefferson Boulevard. As also stated above in Section 4.17.6, Existing Transportation and Circulation System, the City of West Sacramento partnered with Via in 2018 to implement an on-demand rideshare program that provides residents, employees, and visitors with flexible transportation service throughout West Sacramento and to select destinations in Downtown Sacramento. Via operates seven days per week and serves as an on-demand transit option which also provides wheel chair accessible vehicles. Via would also be available to residents at the project site. Additionally, as detailed in Section 4.8 Greenhouse Gas Emissions, the proposed project is consistent with applicable goals and actions of the City of West Sacramento's CAAP.

According to the United States Census, transit trips comprise approximately 1.3 percent of the total commute mode share in West Sacramento.[17] As stated above, the proposed project is anticipated to result in a net increase of approximately 725 residents. In addition to commuting trips, additional transit trips to nearby schools, parks, and shopping areas could occur due to the proposed project. Using SACOG per-capita weekday transit rate of 0.04 Weekday Person Trips by Transit, the project is estimated to generate approximately 29[18] weekday transit trips. Given the low volume of transit trips expected to be generated by the project, existing transit services and facilities would have sufficient capacity to accommodate project-generated transit demand. Therefore, the project would not impair the operation of existing transit facilities or services. Additionally, the proposed project, by itself, would not require additional transit service to the area or improvements to existing transit service frequencies. The proposed project would not preclude, modify, or otherwise affect existing or proposed transit projects or policies identified in the City's General Plan. Therefore, impacts to transit facilities would be **less than significant**.

Summary. As previously stated, although the proposed project would result in an increase in potential bicyclists and pedestrians in the general area, the estimated volumes would not significantly impact existing facilities. In addition, the proposed project would provide pedestrian and bicycle facilities within the development, as well as frontage improvements, including sidewalks, along the north side of Marshall Road and the west side of Otis Avenue. Therefore, the proposed project would be consistent with the City's Mobility Element goals for bicycle and pedestrian facilities, including Goal M-1, Goal M-2, Goal M-5, Goal M-6. Additionally, as detailed in Section 4.8 Greenhouse Gas Emissions, the proposed project would be consistent with applicable goals and actions of the City of West Sacramento's CAAP. In addition, the proposed project would not require new or expanded transit service, nor would it affect existing or planned transit routes, service

[17] (725 persons × 0.35 weekday pedestrian trips/person/day = 253.75 ≈ 254 pedestrian trips/day)

[18] (725 persons × 0.04 weekday transit trips/person/day = 29 weekday transit person-trips/day)

frequencies, or policies identified in the City's General Plan. Accordingly, impacts would be reduced to **less than significant.**

Threshold 4.17.2: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?

Significant and Unavoidable. In September 2013, the Governor's Office signed SB 743 into law, starting a process that fundamentally changes the way transportation impact analysis is conducted under CEQA. These changes include the elimination of auto delay, LOS, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. The VMT standard for evaluating transportation impacts under CEQA became mandatory statewide on July 1, 2020.

As described under Section 4.17.2, Methodology, VMT is a measurement of the amount and distance that a person drives, accounting for the number of passengers within a vehicle. Typically, low-density development located at great distances from other land uses and in areas with few alternatives to the private vehicle provides less access than a location with high density, a mix of land uses, and numerous ways of travel. Therefore, low-density development typically generates more VMT per capita compared to a similarly sized development located in urban areas. Although the City of West Sacramento has not formally adopted its own VMT screening guidelines or thresholds, it relies on SACOG's regional tools and methodologies, including the SACSIM model and screening maps, to evaluate transportation impacts consistent with SB 743. Based on the screening evaluation conducted in Section 4.17.2, Methodology, the proposed project could not be screened out from detailed VMT analysis.

Because the proposed project would not be screened out from a detailed VMT analysis, a comparison of project generated VMT to the applicable regional average was performed to determine the significance of transportation impacts. Consistent with LCI guidance, a residential project is considered to result in a significant transportation impact if it generates VMT per capita that exceeds 85 percent of the applicable regional average.

As shown in **Table 4.17.A, Daily Residential VMT/Capita**, the proposed project would generate a VMT per capita of 20.88, which is higher than the regional threshold (17.43). Because the project's residential VMT exceeds the regional threshold, the project does not meet the screening criteria for a less than significant impact under CEQA.

Table 4.17.A: Daily Residential VMT/Capita

VMT Analysis Scenario	Daily VMT/Capita
	SACOG Region
VMT Threshold[1]	17.43
Project VMT Rate[2]	20.88
Percent Difference	19.79
Above VMT Threshold?[3]	**Yes**

Source: The Enterprise Crossing model base year (2024) model run.
[1] Thresholds are calculated as 85 percent of baseline averages. The SACOG regional baseline average was calculated from the Enterprise Crossing model base year (2024) no project model run.
[2] Obtained from the Enterprise Crossing model base year (2024) plus project model run
[3] SACOG Regional Threshold: 20.50 x 0.85 = 17.43
SACOG = Sacramento Area Council of Government
VMT = vehicle miles traveled

As discussed above, the proposed project would exceed the regional VMT per capita threshold, resulting in a **potentially significant impact** to VMT.

Table 4.17.D: Project Design Features and VMT Measures, as shown below, identifies the project design features and VMT reduction measures that could be implemented to reduce the proposed project's potentially significant VMT impact. **Table 4.17.B** incorporates applicable measures from the California Air Pollution Control Officers Association (CAPCOA) *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (CAPCOA Handbook).[19] These measures reflect feasible strategies that are consistent with the City's General Plan Mobility Element and are intended to reduce travel demand by encouraging alternatives to single-occupancy vehicle use.

[19] California Air Pollution Control Officers Association (CAPCOA). 2024. *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*. November. Website: https://www.airquality.org/residents/climate-change/ghg-handbook-caleemod (accessed June 15, 2026).

Table 4.17.B: Project Design Features and VMT Measures

Measure	Implementation Requirements	VMT Reduction[1]	Application[1]
Proposed Project Design Feature			
T-18. Provide Pedestrian Network Improvement. This measure will increase the sidewalk coverage to improve pedestrian access. Providing sidewalks and an enhanced pedestrian network encourages people to walk instead of drive. This mode shift results in a reduction in VMT and GHG emissions.	The GHG reduction of this measure is based on the VMT reduction associated with expansion of sidewalk coverage expansion, which includes not only building new sidewalks but also improving degraded or substandard sidewalk (e.g., damaged from street tree roots). However, pedestrian network enhancements with non-quantifiable GHG reductions are encouraged to be implemented, as discussed under Expanded Mitigation Options.	Estimated 0.45 percent reduction in VMT.	The project proposes adding approximately another 4.96 miles of sidewalk and pedestrian access.
T-35. Provide Traffic Calming Measures. This measure requires projects to include pedestrian/bicycle safety and traffic calming measures above jurisdictional requirements. Roadways should also be designed to reduce motor vehicle speeds and encourage pedestrian and bicycle trips with traffic calming features.	Traffic calming features may include marked crosswalks, count-down signal timers, curb extensions, speed tables, raised crosswalks, raised intersections, median islands, tight corner radii, roundabouts or mini-circles, on-street parking, planter strips with street trees, chicanes/chokers, and others.	Cannot be quantified.	Cannot be qualified.
Proposed VMT Measures			
T-9: Implement Subsidized or Discounted Transit Program. This measure will provide subsidized or discounted, or free transit passes for employees and/or residents. Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT and thus a reduction in GHG emissions.	The project should be accessible either within 1 mile of high-quality transit service (rail or bus with headways of less than 15 minutes), 0.5 mile of local or less frequent transit service, or along a designated shuttle route providing last-mile connections to rail service. If a well established bikeshare service (Measure T-22-A) is available, the site may be located up to 2 miles from a high-quality transit service. If more than one transit agency serves the site, subsidies should be provided that can be applied to each of the services available. If subsidies are applied for only one service, all variable inputs below should also pertain only to the service that is subsidized.	Up to 5.5 percent (this reduction was not applied due to lack of adequate data).	The project site is within 0.5 mile of Local Bus Route 37.

Table 4.17.B: Project Design Features and VMT Measures

Measure	Implementation Requirements	VMT Reduction[1]	Application[1]
T-21-A: Implement Conventional Carshare Program. This measure will increase carshare access in the user's community by deploying conventional carshare vehicles. Carsharing offers people convenient access to a vehicle for personal or commuting purposes. This helps encourage transportation alternatives and reduces vehicle ownership, thereby avoiding VMT and associated GHG emissions. A variation of this measure, electric carsharing, is described in Measure T-21-B, Implement Electric Carshare Program.	This measure will increase carshare access in the user's community by deploying conventional carshare vehicles. Carsharing offers people convenient access to a vehicle for personal or commuting purposes. This helps encourage transportation alternatives and reduces vehicle ownership, thereby avoiding VMT and associated GHG emissions. A variation of this measure, electric carsharing, is described in Measure T-21-B, Implement Electric Carshare Program.	Up to 0.18 percent (this reduction was not applied due to lack of adequate data).	N/A
T-21-B: Implement Electric Carshare Program. This measure will increase carshare access in the user's community by deploying electric carshare vehicles. Carsharing offers people convenient access to a vehicle for personal or commuting purposes. This helps encourage transportation alternatives and reduces vehicle ownership, thereby avoiding VMT and associated GHG emissions. This also encourages a mode shift from internal combustion engine vehicles to electric vehicles, displacing the emissions-intensive fossil fuel energy with less emissions-intensive electricity. Electric carshare vehicles require more staffing support compared to conventional carshare programs for shuttling electric vehicles to and from charging points. A variation of this measure, conventional carsharing, is described in Measure T-21-A, Implement Conventional Carshare Program.	The GHG mitigation potential is based, in part, on literature analyzing one-way carsharing service with a free-floating operational model. This measure should be applied with caution if using a different form of carsharing (e.g., roundtrip, peer-to-peer, fractional).	Up to 0.02 percent (this reduction was not applied due to lack of adequate data).	N/A

Table 4.17.B: Project Design Features and VMT Measures

Measure	Implementation Requirements	VMT Reduction[1]	Application[1]
T-22-A: Implement Pedal (Non Electric) Bikeshare Program. This measure will establish a bikeshare program. Bikeshare programs provide users with on-demand access to bikes for short term rentals. This encourages a mode shift from vehicles to bicycles, displacing VMT and thus reducing GHG emissions. Variations of this measure are described in Measure T-22-B, Implement Electric Bikeshare Program, Measure T-22-C, Implement Scootershare Program, and Measure T-22-D, Transition Conventional to Electric Bikeshare.	The GHG mitigation potential is based, in part, on literature analyzing docked (i.e., station-based) bikeshare programs. This measure should be applied with caution if using dockless (free floating) bikeshare.	Up to 0.02 percent (this reduction was not applied due to lack of adequate data).	N/A
T-22-B: Implement Electric Bikeshare Program. This measure will establish an electric bikeshare program. Electric bikeshare programs provide users with on-demand access to electric pedal assist bikes for short-term rentals. This encourages a mode shift from vehicles to electric bicycles, displacing VMT and reducing GHG emissions. Variations of this measure are described in Measure T-22 A, Implement Pedal (Non-Electric) Bikeshare Program, Measure T-22 C, Implement Scootershare Program, and Measure T-22-D, Transition Conventional to Electric Bikeshare.	The GHG mitigation potential is based, in part, on literature analyzing docked (i.e., station-based) bikeshare programs. This measure should be applied with caution if using dockless (free floating) bikeshare.	Up to 0.06 percent (this reduction was not applied due to lack of adequate data).	N/A
T-23: Provide Community-Based Travel Planning.	This measure will target residences in the plan/community with community-based travel planning (CBTP). CBTP is a residential based approach to outreach that provides households with customized information, incentives, and support to encourage the use of transportation alternatives in place of single occupancy vehicles, thereby reducing household VMT and associated GHG emissions.	Up to 2.3 percent (this reduction was not applied due to lack of adequate data).	N/A

Table 4.17.B: Project Design Features and VMT Measures

Measure	Implementation Requirements	VMT Reduction[1]	Application[1]
T-40: Establish a school bus program. This measure requires establishing or expanding a school bus program. Busing provides a practical way to transport students to school while also offering reductions in GHG emissions when there is high enough ridership. When districts establish busing programs, they directly replace automobile trips to take students to and from school.	See measure description.	Up to 57 percent (this reduction was not applied due to lack of adequate data).	N/A
T-56: Active Modes of Transportation for Youth. This measure accounts for reductions in VMT achieved by projects that provide infrastructure to support any form of active transport among youth. Trips to school and extracurricular activities represent most of the everyday travel taken by youth. Thus, ensuring that children can use active transportation whenever possible can serve to reduce VMT and allow them to get the necessary exercise to live healthy lives. Safe Routes to Schools (SR2S) provides federal funding for new sidewalks, bike lanes, off-street pathways, and street crossings to help children use active modes of transportation to get to school, bringing health benefits to children, in addition to reductions in VMT from mode-shifts away from private vehicle trips. This is a blanket measure that can cover projects related to all forms of active transport among youth. Methods for this measure were influenced by methodology from CARB.	Specific projects that are implemented need not be funded by SR2S or be located at a school; however, one advantage of the program is the requirement for student travel surveys, which provide critical before and after project data, to quantify the effects of the program.	Up to 22.2 percent (this reduction was not applied due to lack of adequate data).	N/A

Source: California Air Pollution Control Officers Association (CAPCOA). 2024. *Handbook for Analyzing Greenhouse Gas Emission Reduction, Assessing Climate Vulnerabilities, and Advancing Health and Equity, California Air Pollution Control Officers Association.* Note: Number of the measure corresponds to the CAPCOA Handbook.

The proposed VMT reduction measures, as shown above, in **Table 4.17.D**, would result in an estimated 0.45 percent reduction in residential VMT per capita. While the measures identified in **Table 4.17.D** represent a good-faith effort to reduce the project's VMT impact, the overall reduction potential is limited and would not substantially reduce the project's VMT per capita (20.88), which is 19.79 percent higher than the SACOG regional threshold (17.43). Because these measures would only achieve an approximate 0.45 percent reduction and given the uncertainty regarding the effectiveness of the VMT reduction measures, the project would continue to result in a significant

transportation impact. Therefore, the proposed project would result in a **significant and unavoidable** transportation impact related to VMT.

Threshold 4.17.3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. For purposes of CEQA, transportation-related hazards generally refer to roadway engineering aspects of a project (e.g., speed, turning movements, complex designs, substantial distance between street crossings, sight lines) that may cause a risk of collisions that result in serious or fatal physical injury. This analysis focuses on hazards that could reasonably stem from the project, beyond collisions that may result due to unsafe drivers or collisions that could not be prevented by design of the circulation system.

As described in Chapter 3.0, Project Description, ingress and egress to the project site would be provided via four full-access roads: two off Marshall Road, Main Avenue opposite the intersection with Martinique Street and Street B, opposite the intersection with Jamaica Street; and two off Otis Avenue, Street D and Street F.[20] The proposed project would include development of local streets to facilitate circulation throughout the proposed residential development, all of which would be public and meet applicable City Standards. In the northern portion of the project site, Main Avenue, which runs north-south, would serve as a primary street linking Marshall Road to Otis Avenue, by way of Street D, while providing direct access to Streets C and D. Street C would connect to Streets A and B, and Street D would connect to Streets B, E, F, and G. Main Avenue would also include the installation of a traffic circle at Main Avenue and Street D. In the southern portion of the project site, Street I would connect to Streets B and E and Street H would connect to Streets F and G. **Figure 3-9, Proposed Circulation Map,** as illustrated in Chapter 3.0 Project Description, depicts the circulation plan for the project site. Generally, the proposed streets would have 50 to 60 feet cross-section right-of-way, which would accommodate 5- to 8-foot-wide sidewalks. The proposed streets would also be designed to allow fire truck access and would also be designed so as to not introduce hazards due to geometric design features (e.g., sharp curves or dangerous intersections).

Offsite improvements would also be included as part of the proposed project. These off-site improvements would include frontage improvements along the north side of the project site on the south side of Marshall Road, consisting of new sidewalk, curb, and gutter infrastructure, as well as undergrounding of all overhead utilities, construction of street lighting, and installation of landscaping. Similar frontage improvements would be constructed along the Otis Avenue frontage along the west side of Otis Avenue. A single-lane roundabout at the intersection of Marshall Road and Otis Avenue adjacent to the northeastern corner of the project site would also be developed. The primary purpose of this facility is to control existing and project-related traffic along Marshall Road and Otis Avenue. These proposed improvements would be constructed to meet City standards and would be implemented to the satisfaction of the City Engineer.

[20] The street names identified in this EIR as part of the proposed project are temporary names. The permanent street names will be determined during the final design and development of the proposed project.

In addition, the proposed project does not include incompatible uses (i.e., farm equipment) to the surrounding area. Further, the proposed project's land uses would be separated from adjacent land uses by existing roadways and undeveloped land, providing a distance buffer for surrounding development. Therefore, the proposed Project would not introduce safety hazards due to geometric design features or incompatible uses. Impacts would be **less than significant**. No mitigation is required.

Threshold 4.17.4: Would the project result in inadequate emergency access?

Less than Significant Impact. As discussed further in Section 4.15, Public Services, construction activities, including offsite improvements at the intersection of Marshall Road and Otis Avenue, have the potential to affect law enforcement and emergency services, such as emergency vehicle response times, by potentially requiring temporary lane closures, reducing roadway capacity, and/or increasing congestion. To maintain adequate access during construction, the construction contractor would be required to prepare and implement a Transportation Management Plan (TMP) (**Regulatory Compliance Measure TRA-1**) to be reviewed and approved by City staff. The TMP would be prepared consistent with the recommendations of the *California Temporary Traffic Control Handbook*[21] and would include provisions to maintain traffic flow along Marshall Road, safe access into and out of the project site, and emergency access to the project site and adjacent areas during construction. Implementation of the TMP would ensure that emergency vehicles and emergency service providers (i.e., WSFD and WSPD personnel) are notified of any temporary lane closures in advance and can plan for adequate navigation to the project site and within the project area. Traffic management personnel (flag persons), required as part of the TMP would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. If partial lane closures are required, notice would be provided to the WSFD and WSPD, and flag persons would be used to facilitate the traffic flow until construction is complete. With implementation of **Regulatory Compliance Measure TRA-1**, potential impacts related to emergency access during construction of the proposed project would not be impeded.

In addition to conditions during project construction, the Transportation Study (Appendix I) analyzed conditions on area roadways during project operations. The LOS analysis indicated that all but one intersection, Rivermont Street-Allan Drive/Marshall Road, would operate at an acceptable LOS during project operations. However, the deficiency lies on Rivermont Street-Allan Drive, and access along Marshall Road would be unhindered. Furthermore, there are other access points to the project site that would operate at an acceptable LOS and emergency vehicles have priority access to roadways, this would not result in inadequate emergency access to the project site. Furthermore, unimpeded access throughout the development would be maintained by ensuring that vehicles would not be parked or placed in a manner that would impede access for emergency response vehicles. Perimeter and internal roadways would be maintained to allow for the safe and unobstructed passage of emergency response vehicles. As previously discussed, the proposed project would include frontage improvements to the existing roadway network and development of an internal roadway network consistent with City design standards. Overall, the proposed project would provide adequate access and signage for patrons, workers, and emergency access personnel.

[21] California Inter-Utility Coordinating Committee. 2018. *California Temporary Traffic Control Handbook*, 7th Edition. May.

In addition, the proposed internal circulation system would be designed to a wide sufficient width to accommodate emergency vehicles pursuant to the CFC requirements, the City, and the WSFD. In addition, prior to project approval, the WSFD would review the final site plan to ensure that adequate emergency access to the development area is provided. If additional features are required, the proposed project would be required to incorporate these as conditions of approval.

Compliance with the CFC and review and approval by the WSFD would ensure the proposed project would provide adequate emergency access. Impacts would be l**ess than significant**. No mitigation is required.

4.17.7 Cumulative Impacts

Significant and Unavoidable Impact. As defined in Section 15130 of the *State CEQA Guidelines*, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for land use and planning. The cumulative study area for transportation and traffic is described in Chapter 4.0 Existing Setting, Environmental Analysis, Impacts, and Mitigation Measures; the cumulative project list is provided in Chapter 4.0, **Table 4.A**, and a map of the cumulative project locations is also provided in Chapter 4.0, **Figure 4-1**. As described in more detail in **Appendix I,** traffic volumes for cumulative without project conditions were developed using the Enterprise Crossing model provided by City staff. The Enterprise Crossing model is a variant of the SACOG SACSIM23 beta1 version model with further refinements throughout the City, updated Traffic Analysis Zone (TAZ) boundaries, model roadway network, and growth assumptions between a refined base year of 2024 and future year 2050, accounting for large projects within the City, including Yarbrough, Liberty, and River Park Master Plans. LOS is no longer an accepted metric for identifying traffic impacts under CEQA. However, further discussion on the cumulative LOS analysis is included in **Appendix I**.

The proposed project would be consistent with applicable regulations, including the City's General Plan policies as it relates to transit, bicycles, and pedestrian facilities, as described above. The proposed project would not conflict with existing and planned transit facilities in the City and would construct bicycle and pedestrian facilities that would increase the connectivity of the City and further implement the City's General Plan policies.

The proposed project would not include the construction of hazardous or incompatible design features on the project site. The proposed project's plans would be subject to review and approval by the WSFD to ensure the project includes adequate emergency access and would adhere to applicable CFC requirements. other past, present, and reasonably foreseeable projects would be required to comply with existing City General Plan goals, policies, and actions; California Fire Code requirements; and standard and emergency WSFD and City requirements to provide project-specific transportation facilities that accommodate pedestrian, bicycle, and vehicle travel and that meet the City's design requirements to avoid increasing hazards due to a geometric design feature and/or ensure adequate emergency access to and within the project site. In this way, potential transportation impacts would be evaluated and mitigated to a less than significant level by each cumulative project and would not individually contribute to a cumulatively considerable.

As previously stated, the proposed project would generate a VMT per capita of 20.88, which is higher than the residential VMT per capita threshold (17.43). Accordingly, the proposed project would have a significant project-specific impact on VMT. This VMT per capita impact has been calculated using the baseline scenario of the Enterprise Crossing model. Under the future cumulative scenario in the Enterprise Crossing model there are complimentary land uses (e.g., office and retail) that would typically help in lowering this project's VMT profile. Accordingly, it is anticipated that the project will have a lower VMT impact under cumulative conditions compared to the baseline scenario. However, the timeline for implementation of these future complimentary land use projects is unknown at this time and therefore the extent of reduction in project VMT could not be accurately confirmed. As a conservative estimate this analysis concludes that the project will also have a significant and unavoidable impact. As also discussed above, there are no feasible mitigation measures that can reliably guarantee a reduction in VMT below regional thresholds; therefore, the proposed project would result in a **cumulatively significant and unavoidable transportation** impact related to VMT.

4.17.8 Level of Significance Prior to Mitigation

Prior to mitigation, the proposed project would result in potentially significant impacts to VMT.

4.17.9 Regulatory Compliance Measures and Mitigation Measures

4.17.9.1 Regulatory Compliance Measures

The proposed project would comply with the following standards, the implementation of which is intended to reduce impacts related to transportation. In addition, the following regulatory compliance measure is applicable to the proposed project.

Regulatory Compliance Measure TRA-1	**Transportation Management Plan.** The construction contractor shall prepare and implement a Transportation Management Plan (TMP) during construction of the proposed project. The Draft TMP shall be reviewed and approved by the Director of the City of West Sacramento Engineering Department, or designee, prior to the initiation of construction. The TMP shall be prepared consistent with the recommendations of the *California Temporary Traffic Control Handbook* and shall include provisions to maintain traffic flow along Marshall Road, Otis Avenue, safe access into and out of the project site, and emergency access to the project site and adjacent areas during construction.

4.17.9.2 Mitigation Measures

There are no mitigation measures applicable to the proposed project pertaining to transportation.

4.17.10 Level of Significance after Mitigation

As discussed above, **Regulatory Compliance Measure TRA-1** would also assist in reducing potential impacts related to emergency access during construction. However no feasible mitigation measures have been identified to reduce the project's VMT impact to a less than significant. Therefore, the proposed project would have a **significant and unavoidable** impact on VMT.

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4.18 TRIBAL CULTURAL RESOURCES

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for the proposed Brar Farms Residential Development Project (proposed project) to result in impacts to tribal cultural resources (TCRs) in the City of West Sacramento (City). The evaluation is based on consultations between the City and Native American tribal government(s) conducted pursuant to Assembly Bill (AB) 52, the City's General Plan, and the Cultural Resources Assessment that was prepared for the proposed project and included in Appendix D this Draft EIR.

4.18.1 Scoping Process

Two comment letters received during the scoping period addressed TCRs. These comments outlined the City's tribal consultation requirements under AB 52 and Senate Bill (SB) 18, and recommenced that the City consult with Native American tribes and analyze impacts to include mitigation for TCRs in the EIR.

4.18.2 Methodology

4.18.2.1 Sacred Lands File Search

A Sacred Lands File (SLF) Search and Native American Contact List were requested from the Native American Heritage Commission (NAHC) on March 27, 2025. In its response on March 28, 2025, the NAHC indicated that the record search results were negative. However, because the absence of specific site information in the SLF does not indicate the absence of cultural resources in the project area, the NAHC identified methodologies and contacts for conducting required AB 52 tribal consultation. The NAHC recommended that the Shingle Springs Band of Miwok Indians, United Auburn Indian Community of the Auburn Rancheria, Wilton Rancheria, and Yocha Dehe Wintun Nation be contacted for information regarding cultural resources that could be affected by the proposed project.

4.18.2.2 Native American Consultation

On May 16, 2025, the City provided notice of the proposed project to the Native American contacts provided by the NAHC and the tribes that had previously requested such notice under AB 52 and invited Native American tribes to request consultation in response to the notice, pursuant to provisions of AB 52 and SB 18. Notices were sent to the following Native American tribes/entities[1]:

- Shingle Springs Band of Miwok Indians
- United Auburn Indian Community of the Auburn Rancheria
- Wilton Rancheria
- Yocha Dehe Wintun Nation

On June 17, 2025, the Shingle Springs Band of Miwok Indians responded to the City's letter, stating that the Shingle Springs Band of Miwok Indians was not aware of any known cultural resources within the project site. However, the Tribe requested ongoing project updates and asked to be

[1] Multiple contacts were made to some tribes (based on NAHC contact list). The City mailed 14 letters in total.

provided with copies of any cultural or environmental studies conducted for the project. The Shingle Springs Band of Miwok Indians also emphasized the importance of coordination in the event that cultural resources or human remains are discovered during ground-disturbing activities. To date, no further responses have been received and consultation is considered closed.

On July 1, 2025, the City received correspondence from the United Auburn Indian Community. The United Auburn Indian Community did not request formal consultation but provided the City with written mitigation measures to address the identification and treatment of unanticipated discoveries of potential TCRs or resources of cultural significance to the United Auburn Indian Community during project construction. These measures included procedures for halting work, notification, and treatment of discoveries in coordination with the United Auburn Indian Community, and have been incorporated into the project. To date, no further responses have been received and consultation is considered closed.

On July 15, 2025, the City received correspondence from the Wilton Rancheria. The Wilton Rancheria did not request formal consultation; however, Wilton Rancheria confirmed that the project area lies within its ancestral territory and indicated that they had no comments on the proposed project. To date, no further responses have been received and consultation is considered closed.

On July 11, 2025, the Yocha Dehe Wintun Nation responded, confirming that the project area lies within its territory and requested formal government-to-government consultation under AB 52. The Yocha Dehe Wintun Nation requested the City provide a project timeline, detailed project information, and the most recent cultural resources study to support consultation. On July 14, 2025, the Yocha Dehe Wintun Nation followed up on its initial request for consultation. The City held a consultation meeting with the Yocha Dehe Wintun Nation on July 28, 2025. Following several follow-up communications from the City in August 2025 and April 2026, the Yocha Dehe Wintun Nation responded on April 15, 2026, and provided the City with written mitigation measures to address the identification and treatment of unanticipated discoveries of potential TCRs affiliated with the Yocha Dehe Wintun. These measures included procedures for identification of remans, halting work, notification, and treatment of discoveries in coordination with the Yocha Dehe Wintun Nation and have been incorporated into the project. To date, no further responses have been received and consultation is considered closed.

4.18.2.3 Field Survey

LSA archaeologists conducted a pedestrian field survey of the project area on May 20, 2025. Most of the project area consisted of a hay field under cultivation. At the time of survey, the hay on the project site had been recently cut and raked into windrows. The archaeologists walked transects spaced approximately 25 meters (82 feet) apart in the hay stubble. Visibility was generally fair to good, ranging from roughly 50 to 90 percent soil exposure. Part of the project area along Marshall Road was overgrown by vegetation, particularly around historic-period structures that had been previously removed. Where feasible, meandering transects were used to examine sparse exposures of soil among the vegetation. Vegetation around the former structures was tall and dense, making the area inaccessible and unsafe due to the high potential for snakes. Soil consisted of brown dry clay with deep desiccation cracks. Recently dumped refuse was found along Marshall Road. Potential

was identified for surface and subsurface remnant materials and features relating to past structures, including a well, in the overgrown area.

4.18.2.4 Results

According to the Northwest Information Center (NWIC) records search results, one cultural resource has been documented within the project area (57-001628), and two additional cultural resources have been documented within 0.25 mile of the project area (57-001628 and 57-000737). No typical reports have been documented within the project area, and two typical reports have been documented within 0.25 mile of the project area (13969 and 38407).

The resource with the project area, 57-001628, encompasses the eastern half of the project area and extends into and beyond the 0.25-mile buffer area. This resource describes a tribal cultural landscape identified by the Nisenan and Plains Miwok as *Waka-ce/Waka-Ly*, or Wilton Rancheria. This resource encompasses the landscape of the Lower Sacramento River and includes waterways, tule habitat, fisheries, and other wildlife. These natural resources served as critical resources for local inhabitants.

For a summary of historic-period and non-Native American cultural resources, refer to Section 4.5, Cultural Resources, of this Draft EIR.

4.18.3 Existing Environmental Setting

The project area is near the intersection of the traditional cultural territories of the Nisenan and Plains Miwok. The Nisenan generally occupied an area that stretched east-west from the crest of the Sierra Nevada to the Sacramento River, and north-south from between the Yuba and Feather rivers to between the American and Cosumnes rivers. The Plains Miwok lived along the lower reaches of the Mokelumne and Cosumnes rivers and along the Sacramento River between Rio Vista and Freeport.

At the time of European contact, the native populations in the Central Valley spoke seven distinct languages of the Penutian stock: Wintu, Nomlaki, Konkow, River Patwin, Nisenan, Miwok, and Yokuts. Shared linguistic roots along with common technological, economic, ceremonial, and sociopolitical characteristics indicate these groups "had a related history and regular interaction."[2]

Nisenan. The basic social and economic group for the Nisenan was the family or household unit; these units combined into distinct villages, each largely kin-based. Lineage groups were important political and economic units that combined to form tribelets, which were the largest sociopolitical unit identified for Nisenan. Each tribelet "owned" a bounded tract of land and exercised control over its natural resources.[3]

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2 Rosenthal, Jeffrey S., Gregory G. White, and Mark Q. Sutton. 2007. T*he Central Valley: A View from the Catbird's Seat. In California Prehistory: Colonization, Culture, and Complexity*, edited by T.L. Jones and K.A. Klar, pp.147-163. Altamira Press, Lanham, Maryland.

3 Morris, Pete. 2018. *Cultural Resources Inventory Report, Lincoln Crossing South Elementary School, Placer County, California.* ECORP Consulting, Inc., Rocklin, California.

During most of the year, Nisenan usually lived in permanent villages located below about 2,500 feet that typically were positioned near watercourses on low natural rises, ridges, or large flats. Villages included family dwellings, acorn granaries, a sweathouse, and in major villages, a dance house. The availability of resources was considered in the location of permanent villages, since the Nisenan acquired a proportion of their food resources from the general area surrounding them. Other essential food resources were obtained during the summer and fall, when small base camps were established at higher altitudes in proximity to a water source. Food-gathering expeditions were staged from these camps to acquire natural, faunal, and plant resources.

Plains Miwok. Information about Plains Miwok culture is sparse due to the devastation and disruption in the early 19th century brought about by Spanish-introduced epidemics and relocation to Spanish missions, where many Plains Miwok died or were consolidated with other Native California groups. The Plains Miwok, along with other Central California native groups, were intensive food collectors who prioritized plant resources and focused secondarily on fishing and hunting. Acorns were a staple food with other seeds, nuts, roots, and so on as important supplemental foods. The emphasis on plant foods is reflected by the many Plains Miwok artifacts relating to plant food preparation.[4]

Politically, the Plains Miwok were organized into groups that anthropologists termed tribelets. Each of these independent groups maintained a territorial boundary and control over the territory's resources. Within each tribelet's territory were several more or less permanently inhabited settlements and numerous seasonally occupied campsites. Large, multi-lineage villages were located on watercourses, and most were permanently occupied except during the fall acorn harvest. The villages included domed dwellings thatched with tule or grass, and round semi-subterranean earth-covered sweathouses. Assembly houses featured a similar construction to sweat houses but were only built in major villages.[5]

4.18.4 Regulatory Setting

Federal, State, and local regulations and programs related to TCRs that are applicable to the proposed project are described below.

4.18.4.1 Federal Regulations

Archaeological Resources Protection Act. The Archaeological Resources Protection Act was enacted in 1979 with the purpose of securing the protection of archaeological resources and sites on public lands and Native American lands, and to foster increased cooperation and exchange of information between governmental authorities, the professional archaeological community, and private individuals.

Native American Graves Protection and Repatriation Act. The Native American Graves Protection and Repatriation Act (NAGPRA) was enacted on November 16, 1990, to address the rights of lineal descendants, Indian tribes, and Native Hawaiian organizations to Native American cultural items,

[4] Bennyhoff, James A. 1977. *Ethnogeography of the Plains Miwok. Center for Archaeological Research at Davis.* Publication No. 5. University of California, Davis.

[5] *Ibid.*

including human remains, funerary objects, sacred objects, and objects of cultural patrimony. The NAGPRA assigned implementation responsibilities to the Secretary of the Interior. The National NAGPRA program provides support for the following activities:

- Publishing notices for museums and federal agencies in the Federal Register;
- Creating and maintaining databases, including the Culturally Unidentifiable Human Remains Inventories (CUI) Database;
- Making grants to assist museums, Indian tribes, and Native Hawaiian organizations in fulfilling NAGPRA;
- Assessing civil penalties on museums that fail to comply with provisions of the act;
- Providing staff support to the NAGPRA Review Committee and for the Annual Report to Congress;
- Providing technical assistance to federal agencies where there are excavations and discoveries of cultural items on federal and Indian lands;
- Promulgating implementing regulations; and
- Providing technical assistance through training, website information, reports prepared for the Review Committee, supporting law enforcement investigations, and direct personal service.

The National Park Service has compliance obligations for parks, separate from the National NAGPRA Program. National NAGPRA is the omnibus program, the constituent groups all of which are Federal agencies, museums that receive federal funds, tribes and Native Hawaiian organizations, and the public. On private lands, excavations or discoveries are governed first by local or state laws, but human remains or cultural items removed from private or state land may be subject to NAGPRA as a holding or collection, depending on who has control of them.

4.18.4.2 State Regulations

Native American Heritage Commission. In 1976, the California State Government passed AB 4239, creating the NAHC. The NAHC is responsible for identifying and categorizing Native American cultural resources as well as preventing damage to designated sacred sites and associated artifacts and remains. Legislation passed in 1982 authorized the NAHC to identify a Most Likely Descendant (MLD) when Native American remains are found outside the boundaries of a designated cemetery. An MLD has the authority to make recommendations in regard to the treatment and disposition of the discovered remains.

California Public Resources Code (PRC) Sections 5097.9–5097.991. PRC Sections 5097.9–5097.991 provide protection to Native American historical and cultural resources (including sanctified cemeteries, places of worship, religious sites, or sacred shrines) and sacred sites, and gives the NAHC enforcement authority.

Specifically, California PRC Section 5097.98 outlines procedures that must be followed in the event that human remains are discovered. The County Coroner shall make a determination within 2 working days from the time the person responsible for the excavation, or designee, notifies the County Coroner of the discovery or recognition of the human remains. If the County Coroner identifies the remains to be of Native American origin or has reason to believe that the remains are those of Native American origin, the County Coroner must contact the California NAHC within 24 hours. The NAHC representative will then alert a Native American MLD to conduct an inspection of the site and to determine the following course of treatment and action. Additionally, *State CEQA Guidelines* Section 15064.5 sets forth a procedure if human remains are found on land outside of federal jurisdiction.

Health and Health and Safety Code (HSC) Section 7050.5. Section 7050.5 of the HSC protects Native American burials, remains, and associated grave artifacts in the event they are discovered in any location other than a designated cemetery. The HSC mandates the immediate stop of excavation in the site as well as any adjacent or overlying area where the remains or associated items are found and provides for the sensitive disposition of those remains. Should remains be discovered, the County Coroner must determine that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or designee, in the manner provided in PRC Section 5097.98.

Assembly Bill 52. Effective July 1, 2016, AB 52 created a new environmental resource (tribal cultural resources) that must be considered under the California Environmental Quality Act (CEQA). AB 52 requires Lead Agencies evaluate a project's potential to impact "tribal cultural resources" which may include "… [s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register of Historical Resources (California Register) or included in a local register of historical resources."

AB 52 requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a project if they have requested notice of projects proposed within that area. Consultation may include discussing the type of environmental review necessary, the significance of TCRs, the significance of the project's impacts on the TCRs, and alternatives and mitigation measures recommended by the tribe. Consultation must be conducted in good faith between the tribal government and the lead agency and is deemed concluded when either the parties agree to measures to mitigate or avoid a significant effect on a TCR (should a significant effect exist) or when a party concludes that mutual agreement cannot be reached.

Senate Bill 18. SB 18 requires local governments to consult with tribes prior to adoption or amendment of general plans and specific plans. The purpose of SB 18 is to preserve and protect Native American cultural places by involving California Native Americans early in the land use planning process. SB 18 applies to both federally recognized and non-federally recognized tribes and applies to both public and private lands.

4.18.4.3 Regional Regulations

There are no regional regulations that apply to the proposed project with respect to tribal cultural resources.

4.18.4.4 Local Regulations

City of West Sacramento General Plan 2030. The Natural and Cultural Resources Element of the City's General Plan includes various goals and policies related to tribal cultural resources. Goals, policies, and actions applicable to the proposed project include:

- **Goal NCR-9:** To preserve and enhance West Sacramento's important historical, archaeological, and paleontological resources to increase awareness of the City's heritage.
    - **Policy NCR-9.1:** The City shall ensure the preservation of significant historical, archaeological, tribal cultural, and paleontological resources, including those recognized at the national, state, and local levels.
    - **Policy NCR-9.2:** The City shall consult with appropriate organizations and individuals early in the development process [e.g., Information Centers of the California Historical Resources Information System, the Native American Heritage Commission (NAHC); applicable Native American tribes and/or individuals; and historical societies and organizations] to minimize impacts to cultural resources.
    - **Policy NCR-9.15:** For development and infrastructure projects, the City shall endeavor to identify sensitive resources early in the project design efforts to avoid (e.g., to allow preservation in place) or minimize impacts.

4.18.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the proposed project would have a significant adverse impact with respect to tribal cultural resources if it would:

Threshold 4.18.1: **Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:**

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code

Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

4.18.6 Project Impacts

Potential impacts to tribal cultural resources are discussed below.

Threshold 4.18.1(a): Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

***Less Than Significant with Mitigation Incorporated*.** Project site preparation would involve grading activities and placement of fill to raise site elevations along the southerly property line and to achieve proposed finished floor elevations of the site. Ground disturbance would not exceed a depth of excavation of 11 feet below ground surface. It is assumed that the entirety of the approximately 60-acre project site would be disturbed during grading and construction activities. It is anticipated that during project construction a total of 28,456 cubic yards would be cut through grading and excavation activities. Although the field survey did not identify any cultural resources within the project area, the designation of the eastern portion of the project area as a tribal cultural landscape in conjunction with known previously demolished historic buildings and agricultural use within the project area indicate an increased probability for surface and subsurface precontact TCRs. If such resources are discovered during project ground disturbance, a substantial adverse change in the significance of a TCR, as defined in Public Resources Code (PRC) Section 21074, could occur. Therefore, the proposed project has the potential to result in a **potentially significant impact** to subsurface prehistoric and TCRs. Accordingly, implementation of **Mitigation Measure CUL-1**, which requires the protection of known and previously undiscovered archaeological resources, and **Mitigation Measures TCR-1** through **TCR-2**, which require Worker Environmental Awareness Program (WEAP) training prior to ground-disturbing activities and archaeological monitoring during ground disturbance, would reduce this impact. Additionally, **Mitigation Measure TCR-3** incorporates measures requested by the United Auburn Indian Community of the Auburn Rancheria, and Mitigation Measures **TCR-4** and **TCR-5** incorporate treatment protocol measures for the handling of human remains and cultural items affiliated with the Yocha Dehe Wintun Nation, as requested by the Yocha Dehe Wintun Nation during the consultation process. With implementation of **Mitigation Measures CUL-1** and **Mitigation Measures TCR-1** through **TCR-5**, potentially significant impacts to previously undiscovered archaeological and TCRs would be reduced to a **less than significant level**.

Furthermore, no human remains are known to be on the project site or are anticipated to be discovered during project construction. However, in the unlikely event that human remains or funerary/ceremonial objects are discovered during construction of the proposed project and are of Native American origin, the remains may be considered a TCR. If human remains or funerary/ceremonial objects are encountered during construction, the Construction Contractor

would be required to implement **Regulatory Compliance Measure CUL-1**, which requires that the identified remains be treated in accordance with Section 7050.5 of the HSC and PRC Section 5097.98. Section 7050.5 of the HSC states that, in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined whether or not the remains are subject to the coroner's authority. If the human remains are of Native American origin, the coroner must notify the NAHC within 24 hours of this identification. The NAHC will identify an MLD to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.

Based on the findings of the Cultural Resources Assessment and AB 52 and SB 18 consultation, no known TCRs listed or eligible for listing in the California Register or in a local register exist within the project site, and there are no known TCRs on the project site. However, because ground-disturbing activities have the potential to encounter previously undiscovered TCRs, human remains, or associated funerary or ceremonial objects, implementation of the proposed project could result in a **potentially significant impact** to TCRs. Implementation of **Mitigation Measure CUL-1** and **Regulatory Compliance Measure CUL-1**, as identified in Section 4.5, Cultural Resources, and **Mitigation Measures TCR-1** through **TCR-5** would address potentially significant impacts to unanticipated TCRs, human remains, and associated funerary or ceremonial objects, reducing impacts to **less than significant**.

Threshold 4.18.1(b): **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

Less Than Significant with Mitigation Incorporated. As noted above under Threshold 4.18.1(a), a cultural resources record search, an SLF search through the NAHC, AB 52 and SB 18 Native American consultation were conducted for the proposed project. The purpose of these efforts was to identify known TCRs on or near the project site. No previously undiscovered TCRs were identified as part of the records search, although one previously recorded TCR (P-57-001628) is documented on-site according to the NWIC.

As stated above, an archaeological pedestrian field survey of the project site was conducted on May 20, 2025, as part of the Cultural Resources Assessment completed for the proposed project. No cultural resources, including TCRs, were discovered within the project site during the field survey; however, the designation of the eastern portion of the project area as a tribal cultural landscape indicates an increased probability for surface and subsurface precontact TCRs. Therefore, ground-

disturbing activities associated with project construction have the potential to result in a substantial adverse change in the significance of a TCR and the project would result in a **potentially significant impact** to TCRs.

To reduce potentially significant impacts, **Mitigation Measure CUL-1** and **Mitigation Measures TCR-1** through **TCR-3** would be required to be implemented. In addition, implementation of **Mitigation Measure CUL-1** requires the protection of known and previously undiscovered archaeological resources, including halting work in the vicinity of a find and assessment by a qualified archaeologist. **Mitigation Measures TCR-1** and **TCR-2** require WEAP training prior to ground-disturbing activities and archaeological monitoring during all ground-disturbing activities. **Mitigation Measure TCR-3**, as provided by the United Auburn Indian Community of the Auburn Rancheria, further ensures that any unanticipated discoveries of TCRs or resources of cultural significance to the United Auburn Indian Community are identified and treated in coordination with the Tribe and the Lead Agency. In addition, **Mitigation Measure TCR-4** and **TCR-5,** as provided by the Yocha Dehe Wintun Nation, requires that any unanticipated discoveries affiliated with the Yocha Dehe Wintun Nation be subject to established protocols for the treatment and handling of human remains. With implementation of **Mitigation Measure CUL-1** and **Mitigation Measures TCR-1** through **TCR-5**, potentially significant impacts to previously undiscovered archaeological and TCRs would be reduced to a **less than significant level.**

As described above under Threshold 4.18.1(b), no human remains are known to be on the project site or are anticipated to be discovered during project construction. However, in the unlikely event that human remains or funerary/ceremonial objects are discovered during construction of the proposed project and are of Native American origin, the remains may be considered a TCR. If human remains or funerary/ceremonial objects are encountered during construction, the Construction Contractor would be required to implement **Regulatory Compliance Measure CUL-1**, which requires that the identified remains be treated in accordance with Section 7050.5 of the HSC and PRC Section 5097.98.

At the completion of project construction, the proposed project would not result in further disturbance of native soils on the project site and, therefore, project operations would have no potential to impact previously undiscovered TCRs or human remains.

With implementation of **Mitigation Measures TCR-1** through **TCR-5,** and **Mitigation Measure CUL-1** and **Regulatory Compliance Measure CUL-1,** the proposed project would not cause a substantial adverse change in the significance of a TCR defined as a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe that is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. Impacts would be **less than significant with mitigation incorporated**.

4.18.7 Cumulative Impacts

Less Than Significant with Mitigation Incorporated. As defined in Section 15355(b) of the *State CEQA Guidelines*, cumulative impacts refer to the incremental impacts of the project added to other

closely related past, present, and reasonably foreseeable probable future projects. The cumulative study area for cultural resources is described in Chapter 4.0, Existing Setting, Environmental Analysis, Impacts, and Mitigation Measures; the cumulative project list is provided in Chapter 4.0, **Table 4.A**, and a map of the cumulative project locations is provided in Chapter 4.0, **Figure 4-1**.

As detailed in this section, a previously recorded TCR (P-57-001628) is documented within the project site, and an additional cultural resource (P-57-000737) is located nearby. Although the field survey did not identify any cultural resources within the project site, the designation of the eastern portion of the project area as a tribal cultural landscape indicates an increased probability for surface and subsurface precontact TCRs. If such resources are discovered during project ground disturbance, a substantial adverse change in the significance of a TCR, as defined in PRC Section 21074, could occur. Therefore, the proposed project has the potential to result in a **potentially significant impact** to subsurface prehistoric and TCRs. Accordingly, implementation of **Mitigation Measure CUL-1**, which requires the protection of known and previously undiscovered archaeological resources, and **Mitigation Measures TCR-1** through **TCR-3**, which require WEAP training prior to ground-disturbing activities and archaeological monitoring during ground disturbance, would reduce this impact. Additionally, **Mitigation Measure TCR-3** incorporates measures requested by the United Auburn Indian Community of the Auburn Rancheria and

through the consultation process. With implementation of **Mitigation Measures CUL-1** and **Mitigation Measures TCR-1** through **TCR-5**, potentially significant impacts to previously undiscovered archaeological and TCRs would be reduced to **less than significant**.

In addition, if human remains or funerary/ceremonial objects are encountered during construction, the Construction Contractor would be required to implement **Regulatory Compliance Measure CUL-1**, which requires that the identified remains be treated in accordance with Section 7050.5 of the HSC and PRC Section 5097.98. Additionally, all discretionary private development and public works projects within the cumulative study area would be required to comply with CEQA and implement applicable regulatory compliance and mitigation measures. In this way, potential impacts on TCRs would be evaluated and mitigated by each individual private development or public works project. If there were any potential for significant impacts to TCRs, an investigation would be required to determine the nature and extent of the resources and identify appropriate mitigation measures for each project. When resources are assessed and/or protected as they are discovered, impacts to these resources would be reduced to a less than significant level. In addition, future development projects would be required to consult with the appropriate tribes and identify proper mitigation to address any potentially significant impacts to TCRs in the area.

Since all projects within the cumulative study area would be required to implement appropriate regulatory compliance measures and mitigation measures to avoid or mitigate impacts to tribal resources, implementation of the proposed project, when evaluated in combination with the development of projects listed in **Table 4.A**, would not contribute to a cumulatively considerable impact on TCRs. Cumulative impacts to TCRs would be **less than significant with mitigation**.

4.18.8 Level of Significance Prior to Mitigation

Prior to mitigation, potentially significant impacts to unidentified resources that qualify as TCRs have the potential to occur during ground-disturbing activities.

4.18.9 Regulatory Compliance Measures and Mitigation Measures

4.18.9.1 Regulatory Compliance Measures

The proposed project would be required to comply with the standards set forth in **Regulatory Compliance Measure CUL-1** as detailed in Section 4.5, Cultural Resources.

4.18.9.2 Mitigation Measures

Refer to **Mitigation Measures TCR-1** through **TCR-5** below:

Mitigation Measure TCR-1

Workers Environmental Awareness Program (WEAP). Prior to any ground-disturbing activities (including, but not limited to, clearing, grubbing, tree and bush removal, grading, trenching, fence post replacement and removal, construction excavation, excavation for all utility and irrigation lines, and landscaping phases of any kind), and prior to the issuance of grading permits, the Project Applicant or contractor shall retain a tribal representative, as assigned by the consulting tribe(s). The Tribal Representative shall conduct a WEAP and Tribal Cultural Resource Sensitivity Training for all construction personnel and monitors who are not trained archaeologists. In attendance shall be designated archaeologists.

The training session shall focus on the tribal cultural resources (TCRs) that may be encountered during ground-disturbing activities as well as the procedures to be followed in the event of an unanticipated discovery. A basic presentation shall be prepared and presented by the Tribal Representative to inform all personnel working on the project about the cultural sensitivity of the area. The purpose of the WEAP training is to provide specific details on the kinds of cultural materials that may be identified during construction of the Project and explain the importance of and legal basis for the protection of significant TCRs. Each worker shall also learn the proper procedures to follow in the event that TCRs or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the on-call archaeologist and if appropriate, Tribal representative. Necessity of training attendance shall be stated on all construction plans.

Mitigation Measure TCR-2

Archaeological Monitoring. Prior to any ground disturbance, including site clearing, building demolition, grading and trenching, the Project Applicant or their contractor shall ensure that a qualified

archaeologist and a tribal monitor is present to monitor earthmoving activities. If any archaeological resource of Native American origin or association or tribal cultural resource (TCR) (i.e., sites, features, or artifacts) are exposed during ground-disturbing activities all construction occurring within 100 feet of the find shall immediately stop until the tribal monitor, determines if the find is a TCR, evaluates the significance of the find, and determine whether or not additional study is warranted.

Temporary flagging or staking may be required around the resource to avoid any disturbance from construction equipment. The work exclusion buffer may be adjusted based on the recommendation of the Tribal Monitor. The feasibility of avoidance and preservation in place of any identified TCR shall be evaluated prior to considering other management strategies that may be implemented. Significant resource sites shall be subject to appropriate measures (e.g., impact avoidance, preservation in place, recordation). Appropriate treatment of TCRs may include but is not limited to:

- Recordation of the resource(s)
- Avoidance and preservation of the resource(s)

Recovery and reburial of the resource(s) onsite or in a feasible off-site location in a designated area subject to no future disturbance. The location of the reburial shall be acceptable to the tribe(s).

If the tribal monitor identifies a potential TCR, additional efforts such as preparation of a treatment plan or testing, may be warranted prior to allowing construction to proceed in this area. Any data recovery shall be consulted on and agreed upon by the tribe(s). All management strategies recommended by the designated tribal representative and/or Tribal Historic Preservation Officer (THPO) shall be approved by the City of West Sacramento Community Development Director. The Project Applicant or their contractor shall then adhere to the management strategies approved by the City. Ground-disturbing activities may resume once the management strategies have been implemented to the satisfaction of the City's Community Development Director and the tribe(s).

Mitigation Measure TCR-3

Inadvertent Discovery of United Auburn Indian Community Resources. If any suspected tribal cultural resources (TCRs) or resources of cultural significance to the United Auburn Indian Community, including but not limited to features, anthropogenic/ cultural soils, cultural belongings or objects (artifacts), shell, bone, shaped stones or bone, or ash/charcoal deposits are discovered by any person during construction activities including ground disturbing

activities, all work shall pause immediately within 100 feet of the find, or an agreed upon distance based on the project area and nature of the find. Work shall cease in and within the immediate vicinity of the find regardless of whether the construction is being actively monitored by a Tribal Monitor, cultural resources specialist, or professional archaeologist.

A Tribal Representative and the Lead Agency shall be immediately notified, and the Tribal Representative in coordination with the Lead Agency shall determine if the find is a TCR (PRC Section 21074) and the Tribal Representative shall make recommendations for further evaluation and treatment, as necessary.

Mitigation Measure TCR-4 **Yocha Dehe Wintun Nation Treatment Protocol.**

I. Cultural Affiliation

The Yocha Dehe Wintun Nation ("Tribe") traditionally occupied lands in Yolo, Solano, Lake, Colusa and Napa Counties. The Tribe has designated its Cultural Resources Committee ("Committee") to act on the Tribe's behalf with respect to the provisions of this Protocol. Any human remains which are found in conjunction with Projects on lands culturally-affiliated with the Tribe shall be treated in accordance with Section III of this Protocol. Any other cultural resources shall be treated in accordance with Section IV of this Protocol.

II. Inadvertent Discovery of Native American Human Remains

Whenever Native American human remains are found during the course of a Project, the determination of Most Likely Descendant ("MLD") under California Public Resources Code Section 5097.98 will be made by the Native American Heritage Commission ("NAHC") upon notification to the NAHC of the discovery of said remains at a Project site. If the location of the site and the history and prehistory of the area is culturally-affiliated with the Tribe, the NAHC contacts the Tribe; a Tribal member will be designated by the Tribe to consult with the landowner and/or project proponents.

Should the NAHC determine that a member of an Indian tribe other than Yocha Dehe Wintun Nation is the MLD, and the Tribe is in agreement with this determination, the terms of this Protocol relating to the treatment of such Native

American human remains shall not be applicable; however, that situation is very unlikely.

III. Treatment of Native American Remains

In the event that Native American human remains are found during development of a Project and the Tribe or a member of the Tribe is determined to be MLD pursuant to Section II of this Protocol, the following provisions shall apply. The Medical Examiner shall immediately be notified, ground disturbing activities in that location shall cease and the Tribe shall be allowed, pursuant to California Public Resources Code Section 5097.98(a), to (1) inspect the site of the discovery and (2) make determinations as to how the human remains and grave goods should be treated and disposed of with appropriate dignity.

The Tribe shall complete its inspection and make its MLD recommendation within forty-eight (48) hours of getting access to the site. The Tribe shall have the final determination as to the disposition and treatment of human remains and grave goods. Said determination may include avoidance of the human remains, reburial on-site, or reburial on tribal or other lands that will not be disturbed in the future.

The Tribe may wish to rebury said human remains and grave goods or ceremonial and cultural items on or near the site of their discovery, in an area which will not be subject to future disturbances over a prolonged period of time. Reburial of human remains shall be accomplished in compliance with the California Public Resources Code Sections 5097.98(a) and (b).

The term "human remains" encompasses more than human bones because the Tribe's traditions call for the burial of associated cultural items with the deceased (funerary objects), and/or the ceremonial burning of Native American human remains, funerary objects, grave goods and animals. Ashes, soils and other remnants of these burning ceremonies, as well as associated funerary objects and unassociated funerary objects buried with or found near the Native American remains are to be treated in the same manner as bones or bone fragments that remain intact.

IV. Non-Disclosure of Location of Reburials

Unless otherwise required by law, the site of any reburial of Native American human remains shall not be disclosed and will not be governed by public disclosure requirements of the California Public Records Act, Cal. Govt. Code § 6250 et seq. The Medical Examiner shall withhold public disclosure of information related to such reburial pursuant to the specific exemption set forth in California Government Code Section 6254(r). The Tribe will require that the location for reburial is recorded with the California Historic Resources Inventory System ("CHRIS") on a form that is acceptable to the CHRIS center. The Tribe may also suggest that the landowner enter into an agreement regarding the confidentiality of site information that will run with title on the property.

V. Treatment of Cultural Resources

Treatment of all cultural items, including ceremonial items and archeological items will reflect the religious beliefs, customs, and practices of the Tribe. All cultural items, including ceremonial items and archeological items, which may be found at a project site should be turned over to the Tribe for appropriate treatment, unless otherwise ordered by a court or agency of competent jurisdiction. The Project Proponent should waive any and all claims to ownership of Tribal ceremonial and cultural items, including archeological items, which may be found on a project site in favor of the Tribe. If any intermediary, (for example, an archaeologist retained by the Project Proponent) is necessary, said entity or individual shall not possess those items for longer than is reasonably necessary, as determined solely by the Tribe.

VI. Inadvertent Discoveries

If additional significant sites or sites not identified as significant in a project environmental review process, but later determined to be significant, are located within a Project impact area, such sites will be subjected to further archeological and cultural significance evaluation by the Project Proponent, the Lead Agency, and the Tribe to determine if additional mitigation measures are necessary to treat sites in a culturally appropriate manner consistent with CEQA requirements for mitigation of impacts to cultural resources. If there are human remains present that have been identified as Native American, all work will cease for a period of up to 30 days in accordance with Federal Law.

Mitigation Measure TCR-5 Yocha Dehe Wintun Nation Tribal Monitors Protocol.

I. Preferred Treatment

The preferred protocol upon the discovery of Native American human remains is to (1) secure the area, (2) cover any exposed human remains or other cultural items, and (3) avoid further disturbances in the area.

II. Comportment

All parties to the action are strongly advised to treat the remains with appropriate dignity, as provided in Public Resource Code Section 5097.98. We further recommend that all parties to the action treat tribal representatives and the event itself with appropriate respect. For example, jokes and antics pertaining to the remains or other inappropriate behavior are ill advised.

III. Excavation Methods

If, after the Yocha Dehe Tribal representative has been granted access to the site and it is determined that avoidance is not feasible, an examination of the human remains will be conducted to confirm they are human and to determine the position, posture, and orientation of the remains. At this point, we recommend the following procedures:

a. *Tools.* All excavation in the vicinity of the human remains will be conducted using fine hand tools and fine brushes to sweep loose dirt free from the exposure.

b. *Extent of Exposure.* In order to determine the nature and extent of the grave and its contents, controlled excavation should extend to a full buffer zone around the perimeter of the remains.

c. *Perimeter Balk.* To initiate the exposure, a perimeter balk (especially, a shallow trench) should be excavated, representing a reasonable buffer a minimum of 10 cm around the maximum extent of the known skeletal remains, with attention to counter-intuitive discoveries or unanticipated finds relating to this or other remains. The dirt from the perimeter balk should be bucketed, distinctly labeled, and screened for cultural materials.

d. *Exposure Methods.* Excavation should then proceed inward from the walls of the balk as well as downward from the surface of the exposure. Loose dirt should be scooped out and brushed off into a dustpan or other collective device. Considerable care should be given to ensure that human remains are not further impacted by the process of excavation.

e. *Provenience.* Buckets, collection bags, notes, and tags should be fully labeled per provenience, and a distinction should be made between samples collected from: (1) Perimeter Balk (described above), (2) Exposure (dirt removed in exposing the exterior/burial plan and associations, and (3) Matrix (dirt from the interstices between bones or associations). Thus, each burial may have three bags, "Burial 1 Perimeter Balk," "Burial 1 Exposure Balk," "Burial 1 Matrix."

Please note the provisions below with respect to handling and conveyance of records and samples.

f. *Records.* The following records should be compiled in the field: (1) a detailed scale drawing of the burial, including the provenience of and full for all human remains, associated artifacts, and the configuration of all associated phenomena such as burial pits, evidence for preinterment grave pit burning, soil variability, and intrusive disturbance, (2) complete a formal burial record using the consultants proprietary form or other standard form providing information on site #, unit or other proveniences, level depth, depth and location of the burial from a fixed datum, workers, date(s), artifact list, skeletal inventory, and other pertinent observations, (3) crew chief and worker field notes that may supplement or supersede information contained in the burial recording form, and (4) photographs, including either or standard photography or high-quality (400-500 DPI or 10 MP recommended) digital imaging.

g. *Stipulations for Acquisition and Use of Imagery.* Photographs and images may be used only for showing location or configuration of questionable formation or for the position of the skeleton. They are not to be duplicated for publication unless a written release is obtained from the Tribe.

h. *Association*. Association between the remains and other cultural materials should be determined in the field in consultation with an authorized Tribal representative, and may be amended per laboratory findings. Records of provenience and sample labels should be adequate to determine association or degree of likelihood of association of human remains and other cultural materials.

i. *Samples*. For each burial, all Perimeter Balk soil is to be 1/8”-screened. All Exposure soil is to be 1/8”-screened, and a minimum of one 5-gallon bucket of excavated but unscreened Exposure soil is to be collected, placed in a plastic garbage bag in the bucket. All Matrix soil is to be carefully excavated, screened as appropriate, and then collected in plastic bags placed in 5-gallon buckets.

j. Human remains are not to be cleaned in the field.

k. *Blessings*. Prior to any physical action related to human remains, a designated tribal representative will conduct prayers and blessings over the remains. The archaeological consultant will be responsible for insuring that individuals and tools involved in the action are available for traditional blessings and prayers, as necessary.

IV. Lab Procedures

No laboratory studies are permitted without consultation with the tribe. Lab methods are determined on a project-specific basis in consultation with Yocha Dehe Wintun Nation representatives. The following procedures are recommended:

a. *Responsibility.* The primary archaeological consultant will be responsible for insuring that all lab procedures follow stipulations made by the Tribe.

b. *Blessings.* Prior to any laboratory activities related to the remains, a designated tribal representative will conduct prayers and blessings over the remains. The archaeological consultant will be responsible for insuring that individuals and tools involved in the action are available for traditional blessings and prayers, as necessary.

c. *Physical Proximity of Associations.* To the extent possible, all remains, associations, samples, and original records are to be kept together throughout the laboratory process. In particular, Matrix dirt is to be kept in buckets and will accompany the remains to the lab. The primary archaeological consultant will be responsible for copying all field records and images, and insuring that the original notes and records accompany the remains throughout the process.

d. *Additional Lab Finds*. Laboratory study should be done making every effort to identify unanticipated finds or materials missed in the field, such as objects encased in dirt or human remains misidentified as faunal remains in the field. In the event of discovery of additional remains, materials, and other associations the tribal representatives are to be contacted immediately.

V. Re-internment without Further Disturbance

No laboratory studies are permitted on human remains and funerary objects. The preferred treatment preference for exhumed Native American human remains is reburial in an area not subject to further disturbance. Any objects associated with remains will be reinterred with the remains.

VI. Curation of Recovered Materials

Should all, or a sample, of any archaeological materials collected during the data recovery activities – with the exception of Human Remains – need to be curated, an inventory and location information of the curation facility shall be given to tribe for our records.

In addition, implementation of **Mitigation Measure CUL-1** would also be required (refer to Section 4.5, Cultural Resources, of this Draft EIR).

4.18.10 Level of Significance after Mitigation

With implementation of **Regulatory Compliance Measure CUL-1** and **Mitigation Measure CUL-1** as detailed in Section 4.5, Cultural Resources, and **Mitigation Measures TCR-1** through **TCR-5**, all identified potentially significant impacts related to tribal cultural resources would be reduced below a level of significance.

4.19 UTILITIES AND SERVICE SYSTEMS

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for the proposed Brar Farms Residential Development Project (proposed project) to impact utilities and service systems in the City of West Sacramento (City) using the following technical evaluations prepared for the proposed project and included as appendices to the Draft EIR: (1) Air Quality, Energy, and Greenhouse Gas Analysis[1] provided in **Appendix B**; (2) the Drainage Study[2] provided in **Appendix G-1**; (3) Water Model Update Memorandum[3] provided in **Appendix G-2**; (4) Water Study[4] provided in **Appendix G-2**; (5) Runoff Control Plan[5] provided in **Appendix G-3**; (6) Sewer Capacity Study[6] provided in **Appendix G-4**; and (7) Sewer Technical Memorandum,[7] provided as **Appendix G-5**, well as information from the City's 2035 General Plan.

4.19.1 Scoping Process

Several comments received during the scoping period addressed utilities and service systems. These comments raised concerns about the capacity of the City's water and sewer systems, long-term maintenance costs of City infrastructure, potential impacts to private wells, and cumulative utility burdens from regional development and induced growth.

4.19.2 Methodology

The impact analysis presented in this section evaluates potential physical impacts of the proposed project on utilities and service systems and considers whether the proposed project would result in the need for additional infrastructure and supplies based on data and adopted planning documents obtained through service provider websites, the City of West Sacramento 2035 General Plan, and the City of West Sacramento General Plan Update Environmental Impact Report.

4.19.3 Existing Environmental Setting

The project site is located in West Sacramento, Yolo County, California. This section describes the existing environmental setting within the City and the project site as it relates to utilities and service systems.

1 LSA Associates Inc. 2026. *Air Quality, Energy, and Greenhouse Gas Analysis.* July.
2 Continental Development Consultants. 2026. *Drainage Study: Brar Farms, 3425 Marshall Road, West Sacramento, CA.* April 25.
3 Water Works Engineers. 2025. *Water Model Update Memorandum.* October 1.
4 Continental Development Consultants. 2024. *Water Study: Brar Farms, 3425 Marshall Road, West Sacramento, CA.* November 6.
5 Continental Development Consultants. 2024. *Runoff Control Plan: Brar Farms, 3425 Marshall Road, West Sacramento, CA.* November 16.
6 Continental Development Consultants. 2022. *Sewer Capacity Study for Residential Development 3425 Marshall Road West Sacramento, CA 95691*. July 18.
7 Dpoudja & Wells Consulting. 2026. *Brar Farms Residential Development Collection System Impact Evaluation.* March.

4.19.3.1 Water

Potable water service in the City of West Sacramento is provided by the City's Public Works Department. The City operates the George Kristoff Water Treatment Plant (GKWTP), which treats surface water supplies from the Sacramento River watershed for municipal, domestic, industrial, commercial, and irrigation customers. Since incorporation in 1987, the City has transitioned from reliance on groundwater to predominantly surface water diversions from the Sacramento River. As of 2023, the City served approximately 55,000 residents and maintained about 15,900 active service connections.[8]

The City's water distribution system consists of approximately 201 miles of pipelines ranging up to 54 inches in diameter, two pressure zones, multiple storage tanks, and booster pumping stations. The majority of potable water supply is produced at the northern end of the system and conveyed south. This design has created a systemwide vulnerability, as a single disruption at the northern facilities or along the transmission mains could significantly limit the City's ability to deliver water to large portions of the service area. However, the City has identified system redundancy as a critical need and is pursuing improvements such as a north-to-south reliability project, a groundwater backup supply study, and an emergency intertie with the City of Sacramento to ensure continued service in the event of a disruption.[9]

In the vicinity of the project site, the City owns and operates the 8- to 12-inch water lines within Marshall Road and Otis Avenue that would supply the proposed project once operational.

To address existing needs, reliability, and redundancy, as well as to serve near-term growth, the City prepared a Five-Year Capital Improvement Plan (CIP) as part of its Water Master Plan Update. The CIP identifies both non-development projects (to address system reliability, facility rehabilitation, and security) and development-triggered projects (to expand capacity as growth occurs). Major non-development projects include:

- PSIP - City CIP 1241 (PSIP Pump Station Rehab Complete Assessment/Preliminary Design), Backup Generator, and Tank & BPS Replacement
- Bridge District Tank - Backup Generator
- Bridgeway Lakes Tank - Recoating, Site Security and Chemical Tanks Bracing
- Carlin Tank - Site Security and Chemical Tanks Bracing
- GKWTP - Actuators Replacement & City CIPS

[8] City of West Sacramento. 2025. *2024 Water Master Plan Update.* Table 7.1, Supply Evaluation 2015 Water Master Plan Update City of West Sacramento. February. Website: https://www.cityofwestsacramento.org/home/showpublisheddocument/20423/638816065258400000 (accessed February 2026).

[9] *Ibid.*

- Annual Pipeline Replacement Program (City to replace pipelines on an annual basis as prioritized by operational, maintenance, and engineering inputs. Fire flow projects can be included in this prioritization process)

- Emergency Supply Connection with City of Sacramento

- Groundwater Backup Supply

- North to South System Redundancy

According to the City's 2025 Urban Water Management Plan (UWMP),[10] water supply for West Sacramento is primarily provided by surface waters, wholly derived from the Sacramento River. The City also has access to groundwater supplies, extracted from the Yolo Groundwater Subbasin. At the time of incorporation, the City was using groundwater as the primary source of water to service the regional customers; however, with the development of the City's surface water supplies, the City reduced its reliance on its groundwater system and looked to preserve that supply to supplement supply deficits in its surface water system. In addition, the potable water supply portfolio includes three sources: (1) an appropriative water right permit issued by the State Water Resources Board (SWRCB) (Permit 18150), (2) a Central Valley Project (CVP) contract with the U.S. Bureau of Reclamation, and (3) a contract with the North Delta Water Agency (NDWA). Additional groundwater supplies would be sourced for potable uses in the near future following well rehabilitation. Individual components of the City's portfolio are discussed below:

- **SWRCB Permit 18150.** The SWRCB Permit 18150 authorizes the City to divert up to 18,350 acre-feet of water annually from the Sacramento River at a maximum diversion rate of 62 cubic feet per second. However, as described in the City's 2025 UWMP, the availability of water under Permit 18150 may be restricted during drought conditions. Specifically, the permit prohibits the City from diverting water during the months of July and August, requiring the City to rely on its other surface water supplies to meet customer demands during this period. In addition, Permit 18150 is subject to Term 91, a special condition imposed by the SWRCB which limits diversions under certain appropriative water rights when insufficient natural flow is available in the Sacramento River system. Term 91 is typically implemented when the State Water Project (SWP) and the U.S. Bureau of Reclamation's CVP are required to release stored water in excess of low natural flow to meet Sacramento Valley in-basin uses plus export demand.

- **CVP Contract. On May 26, 2020,** the U.S. Bureau of Reclamation amended the City's CVP contract to designate water available under SWRCB Permit 18150 as Base Supply and CVP contract water as Project Supply. The contract limits Base Supply to 18,350 acre-feet per year (afy) and Project Supply to 9,680 afy, providing a combined maximum annual supply of 23,600 afy. Under this contract, the City must prioritize use of Base Supply under Permit 18150 before accessing Project Supply water. Consequently, this makes Project Supply critical during July and August, or when the SWRCB issues a Term 91 curtailment.

10 City of West Sacramento. 2026. *2025 Urban Water Management Plan.* May 20.

Project Supply under the CVP is also subject to the U.S. Bureau of Reclamation's Municipal and Industrial Shortage Policy, which determines available supplies when CVP allocations are less than 100 percent. Under this policy, the City's allocation is generally based on its average Project Supply use during the previous three unconstrained years and the annual CVP allocation percentage. As a result, Project Supply use in unconstrained years directly influences water availability during future shortage conditions.

- **NDWA Contract.** The NDWA Contract guarantees a dependable water supply of adequate quantity and quality for municipal, industrial, and agricultural uses within the NDWA service area. Supplies are sourced from both the State Water Project and California Department of Water Resources (DWR) water rights. This supply is considered 100 percent reliable across all water year types, and the City utilizes NDWA water supplies to serve the portion of its service area situated within NDWA boundaries.

In addition, the City's 2025 UWMP provides a Drought Risk Assessment to assess water supplies and water uses under an assumed drought period that lasts five consecutive years. The assessment identifies that the City maintains ample water supplies to meet current and growing customer demand through 2050 under normal, single-dry, and five consecutive dry year conditions. Under normal year conditions, the City can obtain water from all sources in its portfolio, accounting for typical regulatory and contractual constraints, with anticipated demands generally lower in wetter months and higher in drier months; under these conditions, the City has a surplus of water supply in all months.

A single-dry year is defined as one in which hydrologic, regulatory, and institutional constraints limit access to portions of the City's water supply portfolio. Under these conditions, regulatory restrictions on the City's water rights may become more stringent and supplies available under the City's CVP contract may be significantly reduced. These constraints would result in changes to the monthly availability of certain water supply assets and, depending on actual conditions, could trigger implementation of the City's Water Shortage Contingency Plan (WSCP). A five consecutive dry-year condition is defined as one in which hydrologic, regulatory, and institutional constraints limit access to portions of the City's water supply portfolio over an extended period. Under these conditions, regulatory restrictions on the City's water rights would become more stringent and contractual water supplies would face additional constrained conditions. In addition, as the severity and frequency of droughts increase, demand may decline as realistic constraints on water supply availability are realized at the customer level. However, extended drought conditions may require the City to implement WSCP actions to maintain reliability. The WSCP establishes shortage stages, response actions, monitoring, and communication procedures to ensure minimum health and safety requirements are met while coordinating management of the City's diverse water supply portfolio with regulatory agencies. The City also conducts an annual assessment to evaluate current supply and demand conditions and determine if WSCP actions are needed for near-term shortages.

4.19.3.2 Wastewater

The City of West Sacramento provides wastewater collection services through its Department of Public Works, which owns and operates a municipally managed sewer system serving residential, commercial, and industrial land uses. Wastewater in the city is collected by a network of

predominantly 8 inch or less in diameter gravity mains that convey wastewater to the regional Lower Northwest Interceptor (LNWI) pipeline for treatment at the Sacramento Regional Wastewater Treatment Plant (SRWTP) also known as the EchoWater Resource Recovery Facility. The City's existing wastewater system consists of approximately 164 miles of gravity sewers with sizes ranging from 4 to 30 inches in diameter, 30 miles of pressure pipelines, nine pump stations, and five lift stations.[11] The City's wastewater system serves nearly all areas within the City limits, except for a small southeastern rural area that relies on septic systems. The portion of the sewer system south of the Sacramento Deep Water Ship Canal is newer, with the system north of the Sacramento Deep Water Ship Canal being older. The system directs wastewater to the LNWI, a 120-inch pipeline that ultimately conveys to the EchoWater Resource Recovery Facility for treatment.

The EchoWater Resource Recovery Facility, operated by SacSewer, provides tertiary treatment with granular media filtration for approximately 1.6 million customers and treats an average of 135 million gallons per day. In addition to wastewater collection and treatment, the EchoWater Facility is leading resource recovery initiatives that support regional sustainability and environmental protection. These efforts include the Harvest Water Project, which would expand recycled water infrastructure to serve over 100 local agricultural operations, and the BioGeneration Project, which utilizes biogas to produce combined heat and power, generating approximately 12 megawatts of electricity and process heat to support the facility's anaerobic digesters.[12]

In the vicinity of the project site, the City owns and operates 6-inch, 8-inch, 10-inch, 12-inch, 15-inch, and 18-inch sewer lines that convey wastewater from residential areas and other developments toward the Bridgeway Island Pump Station to the north of the project site.

4.19.3.3 Stormwater

As shown on **Figure 4.10-1: Watershed and Subwatershed** in Section 4.10, Hydrology and Water Quality, the City and the project site are within the Sacramento Valley Subregion of the Sacramento River Watershed, within the Toe Drain-Cache Slough Subwatershed or the Cache Slough Watershed. The Sacramento River Watershed is drained by the Sacramento River, which runs along the eastern and northeastern boundaries of the city and ultimately discharges into Suisun Bay via the Sacramento-San Joaquin Delta. The Sacramento River Watershed encompasses 26,000 square miles and drains much of the northern and central portions of California. The Sacramento Valley Subregion represents the portion of the Sacramento River Watershed starting at Shasta Lake and Redding in the north and extending south to Sacramento and the Sacramento-San Joaquin Delta.

The Sacramento River is located approximately two miles east of the project site and the Sacramento Deep Water Ship Channel is located approximately 0.6 mile west of the project site. As provided above, the Sacramento River flows south from the city and discharges into Suisun Bay via the Sacramento-San Joaquin Delta over 34 miles south of the project site. Suisun Bay drains via the Carquinez Strait to San Pablo Bay, the northern extension of the San Francisco Bay. The Sacramento River Deep Water Ship Channel is a canal from the Port of Sacramento to the Sacramento River. The

11 City of West Sacramento. 2024. *Sewer Master Plan Update*. October 9.

12 California Water Environment Association (CWEA). n.d. EchoWater Resource Recovery Facility. Website: https://carollo.com/solutions/echowater-resource-recovery-facility/ (accessed July 17, 2026).

Sacramento River Deep Water Ship Channel splits from the Sacramento River just north of the Sacramento-San Joaquin Delta, approximately 25 miles south of the project site.

Within the vicinity of the project site the City operates storm drain infrastructure located in Marshall Road. The City's storm drain system includes storm drains, culverts, and detention basins that collect and treat stormwater from developed areas before discharging into the Sacramento River.

The project site does not currently contain any no detention ponds or stormwater drainage collection system. Under existing conditions, stormwater runoff on the project site either infiltrates at the project site, or sheet flows in both an easterly and westerly direction from a localized high point on the project site. Stormwater runoff flowing east would discharge to the existing storm drain facilities along Otis Avenue and stormwater runoff flowing west would be collected by existing stormwater infrastructure associated with the existing residential development located west and southwest of the project site.

4.19.3.4 Solid Waste

Solid waste collection and disposal within West Sacramento is provided by Waste Management (WM). WM provides residential curbside and commercial collection services. In addition to weekly garbage service, WM offers dumpster rentals, bulk trash pick-up, construction waste disposal, and e-waste services. WM also provides recycling and organics pickup in compliance with California's SB 1383 mandate. Recyclable materials accepted include mixed paper, cardboard, glass containers, aluminum and steel cans, and certain plastics. Organic waste accepted includes food scraps, yard trimmings, and food-soiled paper. WM supports waste diversion through source separation, contamination monitoring, and public education initiatives such as the Recycle Right program. Additional services include bulky item pickup, cart repair and replacement, seasonal holiday tree collection, and household hazardous waste drop-off events.[13]

All non-recyclable, non-organic waste generated in the city is disposed of at the 770-acre Yolo County Central Landfill, which is located off County Road (CR) 28H, near its intersection with CR 104. The landfill is owned and operated by the Yolo County Department of Public Works and Transportation. According to the California Department of Resources Recycling and Recovery (CalRecycle), the Yolo County Central Landfill is permitted to accept a maximum of approximately 49 million cubic yards and has a remaining capacity of 33.1 million cubic yards.[14] The landfill is anticipated to operate through the year 2124.[15] The landfill also includes a recycling drop-off facility, a wood-processing facility, and a methane gas collection facility, and accepts drop-offs of household hazardous waste free to County residents on designated Saturdays.

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13 Waste Management. Trash Pickup in West Sacramento, CA. Website: https://www.wm.com/us/en/location/ca/west-sacramento/trash-pickup-west-sacramento-ca (accessed February 2026).

14 California Department of Resources Recycling and Recovery (CalRecycle). SWIS Facility/Site Activity Details: Yolo County Central Landfill (57-AA-0001) Website: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/689?siteID=4033 (accessed February 2026).

15 *Ibid.*

4.19.3.5 Electricity

Pacific Gas and Electric Company (PG&E) provides electricity and natural gas service to West Sacramento. PG&E, a subsidiary of PG&E Corporation, provides natural gas and electric service to approximately 16 million across a 70,000-square-mile service area. The project site would also be within the service territory of PG&E. According to the California Energy Commission (CEC), in 2022, total electricity consumption in the PG&E service area was 27,209 gigawatt-hours (GWh) for the residential sector. Total electricity consumption in Yolo County in 2022 was 1,797 GWh (591 GWh for the residential sector and 1,206 GWh for the non-residential sector).[16]

In addition, according to the most recent data available, in 2023, California's electricity was generated primarily by natural gas (36.56 percent), solar (17.03 percent), wind (11.17 percent), large hydroelectric (11.70 percent), and nuclear (9.34 percent). Total electric generation in California in 2023 was 281,140 GWh, which is down 2.2 percent from the 2022 total generation of 287,220.[17]

4.19.3.6 Telecommunications Facilities

Telecommunication services to the project site would be provided by AT&T or Charter Communications. These services are privately operated and offered to properties in West Sacramento for provider-defined fees. The project site is served by existing telephone, cable, and internet services in the project vicinity.

4.19.4 Regulatory Setting

Federal, State, and local regulations and programs related to utilities and service systems that are applicable to the proposed project are described below.

4.19.4.1 Federal Regulations

Clean Water Act. In 1972, Congress amended the Federal Water Pollution Control Act, making the addition of pollutants to the waters of the United States from any point source unlawful unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. Known today as the Clean Water Act (CWA), Congress has amended this act several times. The objective of the CWA is "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." In the 1987 amendments, Congress directed dischargers of stormwater from municipal and industrial/construction point sources to comply with the NPDES permit program. Important CWA sections are:

- Sections 303 and 304 require states to promulgate water quality standards, criteria, and guidelines and have those standards approved by the United States Environmental Protection Agency (USEPA).

[16] California Energy Commission (CEC). 2025. Electricity Consumption by Entity. Website: http://www.ecdms.energy.ca.gov/elecbyutil.aspx (accessed February 2026).

[17] California Energy Commission (CEC). 2024. 2023 Total System Electric Generation. Website: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2023-total-system-electric-generation (accessed February 2026).

Water quality standards consist of designated beneficial uses for a particular water body (e.g., wildlife habitat, agricultural supply, fishing), along with water quality criteria necessary to support those uses. Water quality criteria are set concentrations or levels of constituents (e.g., lead, suspended sediment, and fecal coliform bacteria) or narrative statements that represent the quality of water that support a particular use. Because California had not established a complete list of acceptable water quality criteria for toxic pollutants, the USEPA Region IX established numeric water quality criteria for toxic constituents in the form of the California Toxics Rule (CTR).

When designated beneficial uses of a particular water body are being compromised by water quality, Section 303(d) of the CWA requires identifying and listing that water body as impaired. Once a water body has been deemed impaired, a Total Maximum Daily Load (TMDL) must be developed for each impairing water quality constituent. A TMDL is an estimate of the total load of pollutants from point, nonpoint, and natural sources that a water body may receive without exceeding applicable water quality standards (often with a "factor of safety" included, which limits the total load of pollutants to a level well below that which could cause the standard to be exceeded). Once established, the TMDL is allocated among current and future dischargers into the water body.

The State Water Resources Board (SWRCB), in compliance with Section 303(d) of the CWA, prepared the 2020/2022 proposed list of impaired water bodies in California. The SWRCB approved the 2020/2022 California Integrated Report (CWA Section 303(d) List/305(b) Report on May 11, 2022. The 303(d) list includes a priority schedule for the development of TMDL implementation for each contaminant impacting the water body. The current list of impairments for the project site receiving waters are provided in Section 4.10.3.3 of Section 4.10, Hydrology and Water Quality.

- Section 401 Certification requires an applicant for a federal license or permit to conduct any activity that may result in a discharge to waters of the United States to obtain certification from the state that the discharge will comply with other provisions of the act. (This is most frequently required in tandem with a Section 404 permit request and is discussed further below.)

- Section 402 establishes the NPDES, a permitting system for the discharges (except for dredge or fill material) of any pollutant into waters of the United States. The USEPA delegated the implementation and administration of the NPDES program to the California State Water Resources Control Board (SWRCB). The SWRCB established nine Regional Water Quality Control Boards (RWQCBs). The SWRCB enacts and enforces the federal NPDES program and all water quality programs and regulations that cross regional boundaries. The nine RWQCBs enact, administer, and enforce all programs, including NPDES permitting, within their jurisdictional boundaries. Section 402(p) requires permits for discharges of stormwater from industrial, construction, and Municipal Separate Storm Sewer Systems (MS4s). To comply with the MS4 permits, stormwater pollution controls must be implemented for construction and operational activities that discharge either directly to surface waters or indirectly through separate municipal storm drains. Pollution control is achieved by establishing engineering measures that have been designed, tested, and successfully implemented throughout the past decades, such as detention

basins and sediment traps, during both the construction period and the operational phases of a project.

Direct discharges of pollutants into waters of the United States are not allowed except in accordance with the NPDES program established in Section 402 of the CWA.

- Section 404 establishes a permit program for the discharge of dredge or fill material into waters of the United States. This permit program is administered by the United States Army Corps of Engineers (USACE).

Pursuant to Section 404 of the CWA, the USACE regulates discharges of dredged or fill material into waters of the United States. These waters include wetlands and non-wetland bodies of water that meet specific criteria, including a direct or indirect connection to interstate commerce. The USACE regulatory jurisdiction pursuant to Section 404 of the CWA is founded on a connection, or nexus, between the water body in question and interstate commerce. This connection may be direct (through a tributary system linking a stream channel with traditional navigable waters used in interstate or foreign commerce) or may be indirect (through a nexus identified in the USACE regulations). The USACE typically regulates as non-wetland waters of the United States any body of water displaying an ordinary high water mark (OHWM). To be considered a jurisdictional wetland under Section 404, an area must possess three wetland characteristics: hydrophytic vegetation, hydric soils, and wetland hydrology. Each characteristic has a specific set of mandatory wetland criteria that must be satisfied in order for that particular wetland characteristic to be met. A project-specific discussion regarding Section 404 issues is provided in Section 4.4, Biological Resources, in this Draft EIR.

Safe Drinking Water Act. The Safe Drinking Water Act (SDWA) is intended to protect public health by regulating the nation's public drinking water supply. The Federal SDWA authorizes the USEPA to set national standards for drinking water to protect against both naturally occurring and man-made contaminants. The USEPA was required to establish primary regulations for the control of contaminants that affected public health and secondary regulations for compounds that affect the taste, odor, and aesthetics of drinking water. Under the provisions of the SDWA, the California Department of Health Services (DHS) has the primary enforcement responsibility. Title 22 of the California Administrative Code establishes DHS authority, and stipulates State drinking water quality and monitoring standards.

4.19.4.2 State Regulations

California Integrated Waste Management Act of 1989. The California Integrated Waste Management Act of 1989 Public Resources Code (PRC) Division 30, enacted through Assembly Bill (AB) 939 and modified by subsequent legislation, required all California cities and counties to implement programs to reduce, recycle, and compost at least 50 percent of wastes by 2000 (PRC Section 41780). The State determines compliance with this mandate to "divert" 50 percent of generated waste (which includes both disposed and diverted waste) through a complex formula. This formula requires cities and counties to conduct empirical studies to establish a "base year" waste generation rate against which future diversion is measured. The actual determination of the diversion rate in subsequent years is arrived at through deduction, not direct measurement: instead

of counting the amount of material recycled and composted, the city or county tracks the amount of material disposed at landfills, then subtracts the disposed amount from the base year amount. The difference is assumed to be diverted (PRC Section 41780.2).

Senate Bill 1016. As previously identified, the California Integrated Waste Management Act of 1989 (AB 939) requires each jurisdiction to divert 50 percent of its solid waste from being disposed of in landfills. The new per capita disposal measurement system (Senate Bill [SB] 1016, Wiggins, Chapter 343, Statutes of 2008) became effective January 1, 2009. It builds on AB 939 compliance requirements by implementing a simplified measure of local jurisdictions' performance. SB 1016 accomplishes this by changing to a disposal-based indicator: the per capita disposal rate, which uses only two factors: a jurisdiction's population and its disposal as reported by disposal facilities. SB 1016 changes how each jurisdiction's progress is measured to reach the 50 percent goal for diverting waste from landfills. This measurement is no longer determinative of compliance. For the California Integrated Waste Management Board (CIWMB) and jurisdictions to more properly focus on successful program implementation, SB 1016 shifts from the historical emphasis on using calculated generation and estimated diversion to using annual disposal as a factor when evaluating jurisdictions' program implementation.

Solid Waste Reuse and Recycling Access Act. The Solid Waste Reuse and Recycling Access Act requires areas in development projects to be set aside for collecting and loading recyclable materials. The act required California Department of Resources Recycling and Recovery (CalRecycle) to develop a model ordinance for adoption by any local agency relating to adequate areas for collection and loading of recyclable materials as part of development projects. Local agencies are required to adopt the model or an ordinance of their own to govern adequate areas in development projects for collection and loading of recyclable materials.

California Green Building Standards Code. The California Green Building Standards Code (CALGreen Code) became effective for all projects beginning after January 1, 2011. Section 4.408, Construction Waste Reduction Disposal and Recycling, of the CALGreen Code mandates that in the absence of a more stringent local ordinance, a minimum of 50 percent of non-hazardous construction and demolition debris must be recycled or salvaged.

California Code of Regulations Titles 14 and 27. These parts of the California Code of Regulations (CCR) require energy-efficient practices as part of solid and hazardous waste handling and disposal.

Senate Bill 1374. SB 1374 requires that the annual report submitted to the California Department of Resources Recycling and Recovery (CalRecycle) include a summary of the progress made in diversion of construction and demolition waste materials. In addition, SB 1374 required that CalRecycle adopt a model ordinance suitable for adoption by any local agency to require 50 to 75 percent diversion of construction and demolition waste materials from landfills by March 1, 2004. Local jurisdictions are not required to adopt their own construction and demolition ordinances, nor are they required to adopt CalRecycle's model by default. However, adoption of such an ordinance may be considered by CalRecycle when determining whether to impose a fine on a jurisdiction that has failed to implement its Source Reduction and Recycling Element (SRRE).

Assembly Bill 1327, California Solid Waste Reuse and Recycling Access Act of 1991. Signed into law in 1991, AB 1327 added Chapter 18 to Part 3 of Division 30 of the PRC. Chapter 18 required the California Integrated Waste Management Board (CIWMB) to develop a model ordinance for adoption of recyclable materials in development projects. Local agencies were then required to adopt the model, or ordinances of their own, in order to govern adequate areas for collection and loading of recyclable materials in development projects by September 1, 1993. If a local agency had not adopted a model ordinance by that date, the CIWMB model would be adopted and enforced by the local agency.

Assembly Bill 75. AB 75, passed in 1999, took effect on January 1, 2000. This bill adds new provisions to the PRC, mandating that State agencies develop and implement an Integrated Waste Management Plan (IWMP); it also mandates that community service districts providing solid-waste services report disposal and diversion information to the city, county, or regional agency in which the community service district is located.

Assembly Bill 341. AB 341, enacted in 2011 and begun in 2012, changes the due date of the State agency waste management annual report to May. The bill makes a legislative declaration that it is the policy goal of the State of California that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by 2020.

Urban Water Management Planning Act. The Urban Water Management Planning Act (UWMP Act) was enacted in 1983. The UWMP Act applies to municipal water suppliers because it provides water service directly to more than 3,000 connections. The UWMP Act requires these suppliers to update their UWMP every five years to demonstrate an appropriate level of reliability in supplying anticipated short-term and long-term water demands during normal, dry, and multiple dry years.

Senate Bill 901: Water Supply and Demand Reliability Assessment (SB 901). SB 901, which was signed into law on October 16, 1995, requires every urban water supplier to identify as part of its UWMP the existing and planned sources of water available to the supplier over a prescribed five-year period. SB 901 requires additional information to be included as part of an urban water management plan if groundwater is identified as a source of water available to the supplier. Provisions of SB 901 would require an urban water supplier to include in the plan a description of all water supply projects and programs that may be undertaken to meet total project water use. As part of this assessment, the public water system is required to indicate whether its total projected water supplies available during normal, single-dry, and multiple-dry water years will meet the project demand associated with the proposed project, in addition to the public water system's existing and planned uses.

California Water Conservation in Landscaping Act. Pursuant to the Water Conservation in Landscaping Act of 2006 (Government Code Section 65591 et seq.), cities and counties in California are required to adopt a water efficient landscape ordinance. Local ordinances are intended to reduce water use for landscaping and irrigation purposes and encourage the use of recycled and reclaimed water for these purposes. The California Department of Water Resources maintains a Model Water Efficient Landscape Ordinance (MWELO) after which local jurisdictions can model their ordinances.

California Water Recycling in Landscaping Act. The California Water Recycling in Landscaping Act promotes the efficient use of water through the development of water recycling facilities. This act stipulates that landscape design, installation, and maintenance should be water efficient, and the use of potable domestic water for landscaped areas is considered a waste or unreasonable use of water if recycled water is available that meets the conditions described in Section 13550 of the California Water Code.

Title 24 of the California Code of Regulations. Energy and water consumption by new buildings in California is regulated by the California Green Building Standard Standards Code, embodied in California Code of Regulations (CCR) Title 24. Title 24 provides efficiency standards for new construction and the rehabilitation of both residential and nonresidential buildings, including building energy consumption, water conservation, and operational efficiencies. Title 24 regulates building energy consumption for heating, cooling, ventilation, water heating, and lighting with regard to both electricity and natural gas, while also regulating water consumption through the installation of efficient plumbing fixtures. The efficiency standards apply to both new construction and rehabilitation of both residential and nonresidential buildings. The building efficiency standards are enforced through the local building permit process. Local government agencies may adopt and enforce energy standards for new buildings, provided these standards meet or exceed Title 24 Building Code requirements. The 2022 Standards went into effect January 1, 2023, following approval by the California Building Standards Commission.

4.19.4.3 Regional Regulations

Yolo County Integrated Waste Management Plan. The Countywide Integrated Waste Management Plan (CIWMP) for Yolo County is a comprehensive strategy developed to manage solid waste and promote recycling and waste diversion throughout the county. The plan addresses waste management conditions within the county and outlines actions to achieve the 50 percent equivalent per capita disposal target and maintain a 15-year disposal capacity.

4.19.4.4 Local Regulations

City of West Sacramento General Plan 2035. The Public Facilities and Services Element of the West Sacramento General Plan 2035 includes the following goals, policies, and actions relevant to utilities and service systems:

- **Goal PFS-1:** To ensure the provision of adequate and efficient facilities and services that maintain service levels, are adequately funded, and strategically allocated.
    - **Policy PFS-1.2:** The City shall require that new development pay its fair share of the cost of providing new public facilities and services and/or the costs of expanding/upgrading existing facilities and services impacted by new development.
    - **Policy PFS-1.3:** The City shall maintain and implement public facility master plans to ensure compliance with appropriate regional, State, and Federal laws; the use of modern and cost-effective technologies and Best Management Practices; and compatibility with current land use policy.

- **Policy PFS-1.6:** The City shall ensure that public facilities, such as utility substations, water storage and treatment plants, and pumping stations are located, designed, and maintained so that noise, light, glare, or odors associated with these facilities will not adversely affect nearby land uses. The City shall require these facilities to use building and landscaping materials that are compatible with or screen them from neighboring properties.

- **Policy PFS-1.7:** The City shall promote the clustering of public and quasi-public facilities (e.g., schools, parks, libraries, child care facilities, community activity centers), the joint-use of these facilities, and agreements for sharing costs and operational responsibilities among public service providers.

- **Goal PFS-2:** To maintain an adequate level of service in the City's water system to meet the needs of existing and future development while improving water system efficiency.

  - **Policy PFS-2.2:** The City shall continue to expand and develop water treatment, distribution, and storage facilities to accommodate the needs of existing and planned development.

  - **Policy PFS-2.3:** To minimize the need for the development of new water sources and facilities and to minimize sewer flows, the City shall promote water conservation both in City operations and in private development, including water recycling.

  - **Policy PFS-2.8:** The City shall, through a combination of water development fees and other funding mechanisms, ensure that new development pay its fair share of costs of water system improvements.

- **Goal PFS-3:** To maintain an adequate level of service in the City's wastewater collection and conveyance system to meet the needs of existing and future development.

  - **Policy PFS-3.3:** The City shall ensure the provision of adequate wastewater service to all new development and support the extension of wastewater service to existing developed areas where this service is lacking.

  - **Policy PFS-3.4:** The City shall work as a member of the Sacramento County Regional Sanitation District (SRCSD) to expand and develop new wastewater treatment and disposal facilities to accommodate the needs of existing and planned development.

  - **Policy PFS-3.5:** The City shall, through a combination of wastewater development fees and other funding mechanisms, ensure that new development pay its fair share of costs of wastewater system improvements.

- **Goal PFS-4:** To maintain an adequate level of service in the City's storm drainage system to accommodate runoff from existing and future development, prevent property damage due to flooding, and improve environmental quality.

- **Policy PFS-4.1:** The City shall design public improvements such as streets, parks, and plazas for retention and infiltration of stormwater by diverting urban runoff to bio-filtration systems such as greenscapes.
- **Policy PFS-4.2:** The City shall continue to expand and develop stormwater drainage facilities to accommodate the needs of existing and planned development.
- **Policy PFS-4.4:** The City shall, through a combination of drainage development fees and other funding mechanisms, ensure that new development pay its fair share of costs of drainage system improvements.
- **Policy PFS-4.5:** The City shall require a comprehensive drainage plan for areas of the city with drainage issues that identifies the facilities that are currently in place and any new facilities that are necessary to provide adequate stormwater drainage for new and existing development. Any new plan shall address permeability and use of bioswales.
- **Policy PFS-4.10:** The City shall require new development to be designed to prevent the diversion of floodwaters onto neighboring parcels.

- **Goal PFS-5:** To minimize the generation of waste, increase recycling, and provide for the collection and disposal of solid waste.
  - **Policy PFS-5.1**: The City shall continue to require mandatory refuse collection throughout the city.
  - **Policy PFS-5.2:** The City shall monitor the operations of refuse and recycling collection contractors to ensure that service levels are adequate.
  - **Policy PFS-5.3:** The City shall continue to coordinate with Yolo County concerning the City's continuing use of the Yolo County Central Landfill and its capacity projections.
  - **Policy PFS-5.4:** The City shall strive to divert 70 percent of solid waste generated by the year 2020 through increased solid waste recycling and reuse methods. The City shall consider recycling methods that involve the production of energy (e.g., methane recovery).
  - **Policy PSF-5.5:** The City shall reduce municipal waste generation by increasing recycling, on-site composting, and mulching, where appropriate, at municipal facilities, as well as using resource efficient landscaping techniques in new or renovated medians and parks.
  - **Policy PFS-5.8:** The City shall require major new development, demolition, and rehabilitation projects to recycle or salvage 70 percent of non-hazardous construction and demolition debris (excluding excavated soil and land-clearing debris).
  - **Policy PFS-5.9:** The City shall encourage increased participation in residential curbside recycling programs, especially for multi-family properties.

- **Policy PFS-5.12:** The City shall encourage residents and businesses to reduce yard waste through methods such as backyard composting, grass recycling, and using resource efficient landscaping techniques.

- **Policy PFS-5.15:** The City shall coordinate with and support other local agencies and jurisdictions in the region to develop and implement effective waste management strategies and waste-to-energy technologies.

- **Goal PFS-6:** To ensure the provision of adequate utilities including gas, electric, and broadband communication services to West Sacramento residents and businesses, and ensure utilities are constructed in a fashion that minimizes their impacts on surrounding development and maximizes energy efficiency.

  - **Policy PFS-6.1:** The City shall work with utility providers to ensure the provision of adequate gas, electric, and broadband communications services and facilities to serve the needs of existing and future residents and businesses.

4.19.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the proposed project would have a significant adverse impact with respect to utilities and service systems impacts if it would:

Threshold 4.19.1: Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;

Threshold 4.19.2: Not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;

Threshold 4.19.3: Not result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments;

Threshold 4.19.4: Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or

Threshold 4.19.5: Fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

4.19.6 Project Impacts

Threshold 4.19.1: Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

***Less Than Significant Impact*.** The project site is located in an urbanized area of the City, adjacent to existing development, that is currently served by existing utilities, including water, sanitary sewer, storm drainage, electricity, and telecommunications infrastructure. Existing and proposed utility improvements and connections are discussed below:

4.19.6.1 Water

The City provides water service to the project site through existing 12-inch water lines within Marshall Road and Otis Avenue. The proposed project would include the installation of 10- and 12-inch water lines throughout the project site that would connect to the existing 12-inch water lines. Additionally, 1-inch residential water service lines and water meters would be installed and would connect to the future homes. All connections to the existing water lines would be reviewed and approved by the City's Public Works Department, as applicable.

Because the proposed project would redevelop an existing vacant site, it would increase the demand for water compared to existing conditions. A discussion of water supply and demand during construction and operation of the proposed project is provided below.

Construction. Short-term demand for water may occur during excavation, grading, and construction activities on site. Water demand for soil watering (fugitive dust control), cleanup, masonry, painting, and other activities would be temporary and would cease once construction is complete. As construction activities would be temporary, and would involve intermittent water use typical of short-term construction activities, the City is anticipated to have adequate capacity to serve the temporary water demand during construction of the proposed project. Therefore, impacts associated with short-term construction activities would not require or result in the construction of new water treatment facilities or the expansion of existing facilities, and construction of the proposed project would not require the need for new or expanded water entitlements. Construction impacts associated with new or expanded water facilities would be **less than significant**, and no mitigation is required.

Operation. The proposed project would connect to the existing 12-inch water lines within Marshall Road and Otis Avenue and use 10- and 12-inch water lines throughout the project site. Any water line improvements would be funded and constructed by the developer and built to City standards. The existing site is currently vacant and undeveloped; therefore, the proposed project would increase water demand at the project site compared to existing conditions. According to water demand factors included in California Emissions Estimator Model (CalEEMod), the proposed project is estimated to demand approximately 24,760 gallons per day or 27.7 afy of water for residential indoor uses, and approximately 1,553 gallons per day or 1.7 afy of water for outdoor uses associated with residential landscaping and the Central Park, parklet, landscaped lots, and the detention basin. Overall, the project would demand approximately 26,313 gallons per day or 29.4 afy. As required of

all new developments in California, the proposed project would comply with State law regarding water conservation measures, including pertinent provisions of Title 24 of the CCR regarding the use of water-efficient appliances, which are adopted in the City's Municipal Code Section 15.12.040.

As detailed above in Section 4.19.3, Exiting Environmental Setting, between 2015 and 2022, average total water use was approximately 11,180 afy. In the near term, the City's projected water demand is expected to increase to 14,143 afy, with an average day demand of 13.51 million gallons per day, as detailed in the 2024 Water Master Plan Update.[18] At full buildout, demand is expected to reach 23,267 afy, or approximately 20.85 mgd within the City. Accordingly, the proposed project's estimated water demand (29.4 afy) represents approximately 0.26 percent[19] of the City's average annual water use between 2015 and 2022. Additionally, the proposed project would represent less than one percent of the City's projected near-term annual demand, and total demand at buildout. Therefore, the proposed project would not necessitate new or expanded water facilities, and the City would be able to accommodate the increased demand for water.

In addition, a project-specific Water Study[20] and a supplemental Water Model Update memorandum[21] were prepared for the proposed project. The Water Study evaluated the adequacy of the proposed onsite water distribution system and its ability to integrate with the City's existing and planned infrastructure. The study included hydrant flow testing at Marshall Road, application of unit demand factors from the City's 2023 Water Master Plan, and hydraulic modeling of Maximum Day Demand conditions. The analysis showed that the proposed on-site improvements, including the 10-inch and 12-inch mains, service laterals, and 25 hydrants, would provide sufficient capacity to meet both domestic and fire flow requirements. All hydrants within the project site were confirmed to meet the CFC requirement of 1,500 gallons per minute for two hours at a minimum residual pressure of 20 pounds per square inch.

Furthermore, the Water Model Update memorandum provided an additional analysis of the proposed project by modeling both Existing plus Project and Ultimate Buildout plus Project conditions. The memorandum confirmed that the addition of project demand would not cause system pressures to fall below City standards or pipeline velocities to exceed allowable thresholds. The study also found that the proposed on-site systems would integrate with the City's distribution network without creating localized deficiencies and that the proposed project would not require upsizing of offsite mains or trigger premature construction of planned CIP projects. The study confirmed that the operation of the proposed project would remain consistent with California Fire Code (CFC) requirements under all modeled conditions.

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18 California Energy Commission (CEC). 2024. 2023 Total System Electric Generation. Website: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2023-total-system-electric-generation (accessed February 2026).

19 (29.4 afy project demand /23,267 afy City's average annual water use =0.001264) x 100= 0.26 percent

20 Continental Development Consultants, Inc. 2025. *Water Study: Brar Farms, 3425 Marshall Road, West Sacramento,* CA. August 13.

21 Water Works Engineers. 2025. *West Sacramento Water Model Update: Brar Farms Development.* October 1.

Given the above, the proposed project would be adequately served by the proposed onsite facilities and would not require the relocation or construction of new or expanded offsite water infrastructure to maintain acceptable levels of service. Therefore, operational impacts related to water supply and distribution facilities would be **less than significant**, and no mitigation is required.

4.19.6.2 Wastewater

The City of West Sacramento maintains an existing sanitary sewer network within the project vicinity, consisting of 6-inch, 8-inch, 10-inch, 12-inch, 15-inch, and 18-inch sewer lines that convey wastewater from residential areas and other developments toward the Bridgeway Island Pump Station to the north of the project site.

Construction. No significant increase in wastewater flows is anticipated as a result of construction activities on the project site. Sanitary services during construction would be provided by portable toilet facilities, which use vehicles to transport waste off-site for treatment and disposal. Therefore, during construction, potential impacts to wastewater treatment and wastewater conveyance infrastructure would be **less than significant**, and no mitigation is required.

Operation. The proposed project would include the installation of new sewer manholes, SDR-35 sewer pipes, new sewer laterals, and new sanitary sewer connections to the existing Bridgeway Island Pump Station. Additionally, it is anticipated that the proposed project would also include the construction of a new sewer lift station to facilitate wastewater conveyance. However, the downstream infrastructure, including existing sewer mains and pump stations, were not originally designed to accommodate the anticipated increase in flows from the proposed project. In July 2022, a Sewer Capacity Study (provided in **Appendix G-4)** was conducted to confirm the adequacy of the existing infrastructure and identify any necessary downstream improvements. Per the results of the analysis, no negative impacts are anticipated to the existing sewer system and there is sufficient capacity to discharge sanitary waste for an additional 259 residential units without exceeding 70 percent pipe capacity.[22] However, the Sewer Capacity Study (**Appendix G-4**) analyzed an earlier iteration of the project's on-site sewer layout that proposed two separate flow pathways out of the project site: one routed north along Martinique Street and a second along Jamaica Street, with both pathways converging at a common downstream node. Subsequent review of this proposed layout determined that the Jamaica Street segment is short and ultimately connects back to Martinique Street such that project flows would enter the same downstream sewer system. Because the purpose of these separate flow pathways was to reduce hydraulic loading on the downstream system, and this configuration would not provide a meaningful reduction, the layout was subsequently revised to a single connection point.

Accordingly, a Sewer Technical Memorandum (provided in **Appendix G-5**) was prepared in March 2026, to amend the findings of the previous Sewer Capacity Study to reflect the revised sewer layout. Under this configuration, all wastewater flows generated by the proposed project would be conveyed via a new on-site lift station which would pump flows westward and then northward into Martinique Street. Wastewater would then be collected by an on-site gravity collection system

[22] Continental Development Consultants. 2022. *Sewer Capacity Study for Residential Development 3425 Marshall Road West Sacramento, CA 95691*. July 18.

consisting of 8-inch, 10-inch, and 12-inch mains, along with individual property laterals, which serve the northern and southern portions of the development before discharging to the proposed lift station. From the lift station, the proposed force main would conveys flows to the single connection point on Martinique Street, where they enter the City's gravity collection system. The *Sewer Technical Memorandum* therefore evaluates the revised sewer layout using the updated hydraulic model provided by the City to assess whether the existing sanitary sewer collection system has sufficient capacity to convey projected wastewater flows from the proposed project and to identify any infrastructure improvements that would be required to meet the additional flows from the prosed project. Based on the *Sewer Technical Memorandum's* findings, it was determined that the existing downstream sanitary sewer collection system, including the Bridgeway Island Pump Station, can adequately convey the projected wastewater flows from the proposed project, and no off-site sewer improvements would be required.

Accordingly, the proposed project would not require, nor would it result in, the construction of new wastewater treatment or collection facilities or the expansion of existing facilities other than those facilities to be constructed on site. Therefore, impacts related to the construction of wastewater treatment or collection facilities are **less than significant**, and no mitigation is required.

4.19.6.3 Stormwater Drainage

As discussed in Section 4.10, Hydrology and Water Quality, the proposed project includes the installation of stormwater conveyance infrastructure to address stormwater runoff from the project site. The proposed project would develop storm drainage improvements, which would include the installation of new curbs and gutters, curb inlets and catch basins, and storm drain manholes throughout the project site, and Low Impact Development (LID) best management practices (BMPs), including a 4.02-acre detention basin located at the center of the site and a pump station to regulate stormwater flows. Stormwater on the project site would be collected by the proposed 15-inch reinforced concrete (RCP) storm drain system and conveyed to the detention basin which would treat and temporarily store stormwater before discharging to the existing 24-inch public storm drain in Otis Avenue via the proposed pump station.

In addition, the proposed LID BMPs (detention basin), which have been designed to be consistent with the requirements of the Phase II MS4 Permit, (**Regulatory Compliance Measure WQ-3**), would capture and detain and discharge stormwater runoff during operation, consistent with the requirements of the Phase II MS4 Permit. Further, as detailed in the Drainage Study (**Appendix G-1**), the sizing of the proposed detention basin was determined by considering the maximum post-development 100-year peak flow values. These peak flows were determined by considering cumulative peak flows from each DMA obtained from the Sacramento Method Analysis and conducting a full-site analysis with the SCS TR-20 Method. The proposed detention basin would be approximately 6 feet deep, with the base at approximately 5 feet and the top at an approximately 11-foot elevation. As determined by the Drainage Study, the peak elevation reached for the 100-year flow is 8.61 feet, providing a freeboard of 2.39 feet.

For purposes of this analysis, the Drainage Study prepared for the proposed project in April 2026 assumed that approximately 55 percent of the proposed development area would be covered by residential units, walkways, roadways, and other paved surfaces. However, the proposed project

would incorporate the previously noted LID design requirements, in total providing a runoff capture capacity of 25.6 acre-feet, significantly exceeding the minimum required capacity of 2.1 acre-feet for flow treatment. Additionally, the recreational and open space areas within the proposed project, including the recreational elements of the detention basin, park, and landscaped lots will be privately owned and maintained by a future HOA. Reclamation District No. 900 (RD 900) would maintain the stormwater and drainage components of the detention basin and said maintenance would be funded by the RD 900 property assessments and to RD 900's standards.

The proposed onsite stormwater facilities and LID BMPs, including the detention basin, would be designed in accordance with the requirements of the Phase II MS4 Permit (**Regulatory Compliance Measure WQ-3**). These facilities would capture, detain, and discharge stormwater runoff consistent with the Permit's requirements. Compliance with the Phase II MS4 Permit would ensure that operational activities do not result in stormwater runoff exceeding the capacity of the existing stormwater drainage system. Therefore, operational impacts related to the creation or contribution of stormwater runoff that could exceed the capacity of existing or planned drainage systems would be **less than significant**, and no mitigation would be required.

4.19.6.4 Electric Power

Because the project site is currently undeveloped, the project site does not currently generate any electrical demand. The proposed project would include connections to surrounding electrical infrastructure and operation of the proposed project would result in increased demand for electricity from PG&E. Refer to Section 4.6, Energy, for a detailed discussion of the proposed Project's electricity usage. As discussed in Chapter 3.0, Project Description, the proposed project includes connections to the existing PG&E electrical transmission lines that run along the southern and northern edges of the project site. Additionally, the proposed project includes undergrounding of all overhead utilities and construction of street lighting along the project site frontage on the south side of Marshall Road and western side of Otis Avenue.

Construction. Project construction would require energy resources primarily in the form of fuel consumption to operate heavy equipment, light-duty vehicles, machinery, and generators. Transportation energy represents the largest energy use during construction and would occur from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction worker vehicles that would use petroleum fuels (e.g., diesel fuel and/or gasoline), rather than electricity. Electricity use during construction would be short-term, associated with powering tools and equipment, temporary lighting, temporary site infrastructure (such as portable generators), and operation system and controls, and would cease following completion of construction.

Impacts related to electricity use during construction would be temporary and relatively small in comparison to Yolo County's overall use of the State's available energy resources. Overall, the amount of electricity anticipated under project construction is not anticipated to exceed existing distribution capacity of the infrastructure serving the project site, and construction activities are not expected to require new, unplanned, or physically altered electrical transmission or distribution facilities. Therefore, electricity demand during construction of the proposed project would be **less than significant**, and mitigation is not required.

Operation. Energy use consumed by operation of the proposed project would be associated with electricity consumption and fuel used for vehicle trips associated with the project. According to demand factors included in the CalEEMod emissions model, the proposed project is estimated to demand approximately 2,208,159 kilowatt-hours (kWh) per year or 2.21 GWh per year of electricity with the implementation of energy efficiency measures and sustainability features as required by the Title 24 of the California Building Code (CBC). According to the CEC, total electricity consumption in the PG&E service area in 2023 was 72,933 GWh (26,199 GWh for the residential sector and 46,734 GWh for the non-residential sector), while total electricity consumption in Yolo County in 2023 was 1,693 GWh (1,693,000,000 kWh).[23] Therefore, the proposed project's electricity demand would represent less than 0.03 percent[24] of PG&E's total demand and would increase Yolo County's annual electricity consumption by less than 0.13 percent. [25] Service providers utilize projected demand forecasts in order to provide an adequate supply or plan for surplus in the service area. As discussed in Section 4.6, Energy, there are sufficient planned electricity supplies in the PG&E service area for estimated net increases in energy demands through 2030.

Because the proposed project would only represent a small fraction of electricity demand in PG&E's service area, the project would meet Title 24 requirements, and there would be sufficient electricity supplies available, energy demand for the proposed project would be less than significant, and no mitigation is required. The supply and distribution network within the area surrounding the project site would remain essentially the same as currently exists, with the exception of on-site improvements to reconfigure existing infrastructure to serve the proposed project. The proposed project would not increase electrical demand beyond existing projections from the local electricity provider, and the project site is within a developed service area with existing demand. Therefore, the proposed project would not require the construction of any physical improvements related to the provision of electricity service that would result in significant environmental impacts, and the proposed project's impacts would be **less than significant**, and no mitigation is required.

4.19.6.5 Natural Gas

Because the project site is currently undeveloped, the project site does not currently generate any natural gas demand. The proposed project would not include any new connections to natural gas infrastructure and operation of the proposed project would not include natural gas usage. Therefore, the proposed project would not generate any new natural gas demand and there would be **no impact** associated with natural gas.

4.19.6.6 Telecommunications Facilities

Telephone, cable, and internet services are located in the vicinity of the project site and would be extended onto the project site. Additionally, cable box locations would be carefully planned and coordinated with utility providers and the landscape architect to be unobtrusive and screened from public view where possible. Installation of telecommunications infrastructure would consist of minor

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23 California Energy Commission. 2025. California Energy Consumption Dashboards. Website: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-0 (accessed February 2026).

24 2.21 GWh per year / 72,933 GWh per year x 100 = 0.003029 percent

25 2.21 GWh per year / 1,693 GWh per year x 100 = 0.1306 percent

utility improvements, including placement of conduit, service lines, junction boxes, and related equipment within proposed utility corridors and previously disturbed areas of the project site. These improvements would occur concurrently with general site preparation, trenching, and utility installation activities. The construction and expansion of these facilities would occur on site during the site preparation and earthwork phase and are not expected to impact any telephone, cable, or internet services offsite that serve surrounding areas. No new off-site telecommunications infrastructure, transmission facilities, or major equipment installations would be required to serve the project. Construction activities associated with telecommunications installation would be limited in duration, localized, and consistent with typical utility trenching practices.

Additionally, the operation of telecommunications facilities do not generate noise, emissions, traffic, or other environmental effects that would adversely affect surrounding land uses. Therefore, the proposed impacts associated with the relocation or construction of new or expanded telecommunication facilities and impacts would be **less than significant**, and no mitigation is required.

Threshold 4.19.2: Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less Than Significant Impact. As discussed above under Threshold 4.19.1, the water supply and demand analysis prepared as part of the UWMP and the City's Water Master Plan update indicates that the City would have sufficient supplies available during normal, single dry year, and five-year drought conditions. Both planning documents incorporate the anticipated future populations and land uses for the City, as provided by the City's General Plan, into water demand estimates. Upon approval of the proposed General Plan and zoning amendments, the project would be consistent with the Low-Density Residential (LR) land use designation in the City's General Plan and Southport Framework Plan.

Additionally, as also discussed under Threshold 4.19.1, the proposed project is estimated to demand approximately 24,760 gallons per day or 27.7 afy of water for residential indoor uses, and approximately 1,553 gallons per day or 1.7 afy of water for outdoor uses associated with residential landscaping and the Central Park, parklet, landscaped lots, and the detention basin. Overall, the project would demand approximately 26,313 gallons per day or 29.4 afy. Between 2015 and 2022, the average total water use in the City was approximately 11,180 afy. In the near term, the City's projected water demand is expected to increase to 14,143 afy, with an average day demand of 13.51 million gallons per day (mgd), as detailed in the 2024 Water Master Plan Update. At full buildout, demand is expected to reach 23,267 afy, or approximately 20.85 mgd within the City. Accordingly, the proposed project's estimated water demand (29.4 afy) represents approximately 0.26 percent[26] of the City's average annual water use between 2015 and 2022. Additionally, the proposed project would represent less than one percent of the City's projected near-term annual demand, and total demand at buildout.[27] Furthermore, the City maintains a diverse supply portfolio that provides operational flexibility and reliability. As discussed in Section, 4.19.3, Existing Environmental Setting,

[26] (29.4 afy project demand /23,267 afy City's average annual water use =0.001264) x 100= 0.26 percent

[27] 2.21 GWh per year / 1,693 GWh per year x 100 = 0.1306 percent

the potable water supply portfolio includes three sources: (1) an appropriative water right permit issued by the SWRCB (Permit 18150), (2) a CVP contract with the U.S. Bureau of Reclamation, and (3) a contract with the NDWA. Additional groundwater supplies would be sourced for potable uses in the near future following well rehabilitation. The City would also continue to pursue reliability improvements, including a north-to-south system redundancy project, a groundwater backup supply program, and an emergency intertie with the City of Sacramento, to ensure that supplies remain sustainable throughout the future.

Additionally, as detailed in the City's UWMP and the Water Master Plan Update, sufficient supplies are available to serve the proposed project and reasonably foreseeable future development during normal, single-dry, and multiple-dry year scenarios. Impacts would be **less than significant**, and mitigation is not required.

Threshold 4.19.3: Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. The proposed project would generate domestic wastewater associated with typical residential uses, including wastewater from sinks, toilets, showers, and laundry facilities. As discussed, in Section 4.19.3, Existing Environmental Setting, wastewater collection for the proposed project would be provided by the City, and wastewater treatment would be provided by SacSewer, located approximately eight miles southeast of the project site. The proposed project would include the installation of new sewer manholes, SDR-35 sewer pipes, new sewer laterals, and new sanitary sewer connections to the existing Bridgeway Island Pump Station.

The City's 2015 Sanitary Sewer Master Plan Update and 2024 Sewer Master Plan Update did not contemplate the development of this project. As a result, an assessment was completed of the project's impact on the City's existing sewer infrastructure. The purpose of the assessment was to identify what improvements are needed to serve the project, such as a new sewer lift station to facilitate wastewater conveyance from the site. As stated above under Threshold 4.19.1, the Sewer Technical Memorandum (provided in **Appendix G-5**) amended the findings of the January 2026 Sewer Capacity Study to reflect the revised sewer layout of the proposed project. This new configuration would allow all wastewater flows generated by the proposed project to be conveyed via an on-site lift station that would pumps flows westward and then northward into Martinique Street. Wastewater would then be collected by an on-site gravity collection system consisting of 8-inch, 10-inch, and 12-inch mains, along with individual property laterals, which would serve the northern and southern portions of the development before discharging to the lift station. From the lift station, the proposed force main would convey flows to the single connection point on Martinique Street, where flows enter the City's gravity collection system. Based on the Memorandum's findings, it was determined that the existing downstream sanitary sewer collection system, including the Bridgeway Island Pump Station, can adequately convey the projected wastewater flows from the proposed project, and no off-site sewer improvements would be required.

In addition, according to wastewater generation factors included in the CalEEMod emissions model, the proposed project is anticipated to generate approximately 24,760 gallons per day or 27.7 afy of wastewater, which represents approximately 0.014 percent[28] of the EchoWater Facility treatment capacity of 181 million gallons per day. Therefore, the EchoWater Facility has sufficient capacity to serve the proposed project in addition to its existing commitments. Impacts related to wastewater treatment would be **less than significant**, and no mitigation is required.

Threshold 4.19.4: Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. Regular trash pickup is provided by the City of West Sacramento through a contract with Waste Management, Inc. (WM), which provides and manages trash, recycling, and composting services to city residents.

The vast majority of refuse generated in the city of West Sacramento goes to the Yolo County Central Landfill. The Yolo County Central Landfill is permitted to receive a daily maximum of 3,000 tons per day. The landfill has enough projected capacity to serve residents and businesses until approximately 2124.[29]

Construction activities occurring on the project site would generate solid waste; however, the proposed project would be required to comply with the CALGreen Code, which requires that at least 65 percent of non-hazardous construction and demolition waste from non-residential construction operations be recycled and/or salvaged for reuse (Section 4.408 of the 2022 CALGreen Code), thus reducing the input of solid waste to the receiving landfill. Solid waste generated by construction activities associated with the proposed project would not cause the capacity at the Yolo County Central Landfill to be exceeded.

Based on the CalEEMod outputs, the proposed project is estimated to generate approximately 169.5 tons per year, or 929.8 pounds of solid waste per day, during operations. Additionally, the proposed park facilities are estimated to generate approximately 1.21 tons per year, or 6.6 pounds of solid waste per day. Overall, the proposed project would generate approximately 170.7 tons per year, or 936.6 pounds per day, of solid waste. The increase in solid waste generated by the proposed project would constitute approximately 0.016 percent[30] of the average daily permitted capacity of 3,000 tons per day at the Yolo County Central Landfill. Therefore, solid waste generated by the proposed project would not cause an exceedance of the Yolo County Central Landfill capacity. Accordingly, the landfill serving the proposed project would have sufficient permitted capacity to accommodate its

[28] (24,760 gallons per day/181,000,000 million gallons per day) x 100 = 0.0136 percent (rounded to 0.014 percent).

[29] California Department of Resources Recycling and Recovery (CalRecycle). SWIS Facility/Site Activity Details: Yolo County Central Landfill (57-AA-0001). Website: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/689?siteID=4033 (accessed February 2026).

[30] (0.4682 tons per day of project waste / 3,000 tons per day landfill permitted capacity =0.0001560667) x 100 =0.01560667 percent of landfill capacity used (rounded to 0.016 percent).

solid waste disposal needs. Therefore, the proposed project would not generate solid waste in excess of State or local standards, or otherwise impair the attainment of solid waste reduction goals. Impacts would be **less than significant**, and no mitigation is required.

Threshold 4.19.5: Would the project comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste disposal practices in California are governed by multiple federal, State, and local agencies that enforce legislation and regulations ensuring that landfill operations minimize impacts to public health and safety and the environment. The project site is located within the City's service area for solid waste collection services, and within the Yolo County Integrated Waste Management Division's jurisdiction area for landfill operations and facility compliance.[31] The County has an adopted Countywide Integrated Waste Management Plan (CIWMP) that requires countywide facilities to meet 15-year capacity requirements and was prepared in accordance with the California Integrated Waste Management Act of 1989 (AB 939). The CIWMP sets goals, policies, and objectives for the development and implementation of coordinated waste reduction programs for jurisdictions within Yolo County (including West Sacramento).

Construction and operation of the proposed project would comply with applicable federal, State, and local statutes and regulations related to solid waste, including AB 75 (solid waste diversion), AB 1826 (organic waste recycling), and SB 1383 (organic waste collection services), and SB 1016 (disposal-based reporting). The project would implement solid waste diversion requirements during operation in accordance with AB 75, such as providing adequate on-site refuse, recycling, and organic waste containers; requiring source separation of recyclable and organic materials; and participating in the City's solid waste, recycling, and organics collection programs in accordance with Chapter 8.08 (Solid Waste) of the City's Municipal Code.[32] In addition, required participation in the citywide recycling programs would support the City's compliance with SB 1016's disposal-based reporting requirements, thereby reducing demand for landfill space. During operation, the project would be required to provide adequate on-site refuse, recycling, and organic waste collection infrastructure consistent with City standards, supporting residential recycling and organics collection in accordance with Policy PFS-5.9 of the City of West Sacramento General Plan. Accordingly, compliance with federal, State, and local statutes and regulations related to solid waste, including the County's CIWMP and agency permits, SB 1016, and the CALGreen Code would ensure that impacts associated with regulations related to solid waste would be **less than significant**, and no mitigation is required.

4.19.7 Cumulative Impacts

Less Than Significant Impact. As defined in Section 15355(b) of the *State CEQA Guidelines*, cumulative impacts refer to the incremental impacts of the project added to other closely related past projects, current projects, and probable future projects. The cumulative study area for utilities

31 Yolo County. n.d. Integrated Waste Management Division Yolo County. Yolo County Central Landfill. Website: https://www.yolocounty.gov/government/general-government-departments/community-services/integrated-waste-management-division/central-landfill (accessed February 2026).

32 City of West Sacramento. 2025. *Code of Ordinances, Zoning Code (Municipal Code) Chapter 8.08, Solid Waste*. Website: https://ecode360.com/43200771#43200771 (accessed February 2026).

and service systems is described in Chapter 4.0; the cumulative project list is provided in Chapter 4.0, **Table 4.A**, and a map of the cumulative project locations is provided in Chapter 4.0, **Figure 4-1**.

Water. The geographic area for the cumulative analysis of water infrastructure is the City of West Sacramento. The projections for water demand in the City's service area are based on regional population and economic growth forecasts, and account for potential future development within its service area, including the additional demand for water generated by the cumulative projects. As discussed previously, population growth generated by the proposed project in conjunction with cumulative projects would not result in substantial unplanned population growth.

In addition, as discussed under Threshold 4.19.1, a project-specific Water Study (August 2025) and a supplemental Water Model Update memorandum (October 2025) were prepared for the proposed project. These studies evaluated the adequacy of the proposed onsite water distribution system and its integration with the City's existing and planned infrastructure. Although the modeling stated that the proposed project would increase potable water demand relative to existing conditions, the analysis demonstrated that the proposed onsite improvements, including installation of 10-inch and 12-inch water mains, individual service laterals, and 25 fire hydrants, would provide sufficient capacity to meet both domestic and fire flow requirements. The studies concluded that the proposed project would be adequately served by the planned onsite distribution facilities and would not require the relocation or construction of new or expanded offsite water infrastructure to maintain acceptable levels of service.

The Water Model Update also evaluated cumulative conditions by modeling both Existing plus Project and Ultimate Buildout plus Project scenarios under Maximum Day Demand. This cumulative analysis confirmed that while the project would incrementally increase potable water demand, the additional loading did not result in significant decreases in system pressures or increases in pipeline velocities beyond the City's design criteria. Furthermore, although the proposed project would not independently trigger the need for immediate off-site infrastructure upgrades, the proposed project would contribute incrementally to system-wide demand increases that reinforce the need for CIP projects identified in the City's 2024 Water Master Plan, including installation of a 2.1 million gallon storage tank (T-1) and a 5,700-foot 20-inch transmission main along Jefferson Boulevard (TM-1).

Accordingly, while the proposed project would incrementally contribute to system-wide water demand, the cumulative modeling demonstrates that system performance would remain within City design standards. Additionally, as discussed above, the City's 2024 Water Master Plan has already identified two long-term improvements, T-1 and TM-1, to address cumulative growth across the service area. Because these improvements are planned to accommodate regional development, the project's contribution would not be cumulatively considerable. Therefore, cumulative impacts to water supply and distribution facilities would be **less than significant**.

Wastewater. The geographic area for the cumulative analysis for wastewater treatment is defined as the City and the SacSewer service area which serves the Sacramento region including unincorporated areas of Sacramento County, and the cities of Citrus Heights, Elk Grove, Folsom, Rancho Cordova, Sacramento, and West Sacramento. The wastewater capacity of the SacSewer system is designed to accommodate the growth forecast within the SacSewer service area and development outlined in the General Plans for jurisdictions within its service area. As discussed in

Section 4.14, Population and Housing, population growth generated by the proposed project in conjunction with cumulative projects, would not induce substantial unplanned population growth in the City. The Sacramento Area Sewer District System Capacity Plan 2020 Update[33] is a comprehensive plan that addresses existing and buildout capacity needs. Therefore, the cumulative population and housing growth from the proposed project and the cumulative projects would be planned for and SacSewer would have adequate capacity for the increased wastewater treatment demand associated with implementation of the proposed project and the cumulative projects within its service area. Accordingly, impacts would be **less than significant.**

Electricity. The geographic area for the cumulative analysis of impacts to the provision of electricity is the service territory of PG&E. PG&E's service area covers approximately 70,000 square miles in Northern and Central California, with the provision of energy service to approximately 16 million across the service territory.[34] The projections of statewide electricity supply capacity demand rates are cumulative in nature. They are based on population and economic growth in addition to such physical variables as average temperature and water supplies (important to hydroelectric generation) in a given year. The total annual electricity consumption in the PG&E service area in 2022 was 27,209 GWh.[35] While this forecast represents a large increase in electricity consumption, the proposed project's percent of cumulative consumption of electricity in the PG&E service area would be negligible. Therefore, any increase in electrical demand resulting from the proposed project would be incremental compared to an increase in regional demand. Sufficient electricity supplies and infrastructure capacity are available, or have already been planned, to serve past, present, and reasonably foreseeable projects.

Additionally, Title 24 of the California Administrative Code regulates energy and water consumption in new construction and regulates building energy consumption for heating, cooling, ventilation, water heating, and lighting. Therefore, in relation to the cumulative study area, the proposed project would not generate a significant cumulative increase in demand for electricity or a significant disruption in service or service level. Therefore, the proposed project's contribution to electricity impacts would **not be cumulatively considerable**, and no mitigation is required.

Solid Waste. The geographic area for the cumulative analysis of solid waste infrastructure is the County of Yolo Integrated Waste Management Division's service territory. Development associated with the proposed project would contribute to an increased demand for landfill capacity for solid waste. The Yolo County Central Landfill has a maximum permitted capacity of 49 million cubic yard and has a remaining capacity of 33.1 million cubic yards. As discussed under Threshold 4.17.4 above, the proposed project would only constitute approximately 0.016 percent of the remaining average daily capacity at the Yolo County Central Landfill. Therefore, the Yolo County Central Landfill has sufficient permitted capacity to provide for Yolo County's solid waste disposal needs, which would be

33 Sacramento Area Sewer District. 2020. *System Capacity Plan 2020 Update*. December. Website: https://sacsewer-bucket.s3.us-west-1.amazonaws.com/wp-content/uploads/2020-SCP-Final-Report_Fee-Area-Names-Update_6-2-2025.pdf (accessed February 2026).

34 PG&E. 2025. *Company Profile.* Website: https://www.pge.com/en/about/company-information/company-profile.html (accessed February 2026).

35 California Energy Commission (CEC). 2025. Electricity Consumption by Entity. Website: http://www.ecdms.energy.ca.gov/elecbyutil.aspx (accessed February 2026).

further reduced through compliance with federal, State, and local statues and regulations related to solid waste generation.

Based on its current daily maximum permitted disposal capacities and current average daily tonnage, the Yolo County Central Landfill will reach capacity in 2124.[36] Therefore, there is currently sufficient permitted capacity within the existing waste management system serving Yolo County to accommodate the County's future solid waste disposal needs. Therefore, the proposed project's contribution to solid waste impacts would **not be cumulatively considerable**, and no mitigation is required.

Telecommunication Facilities. The geographic area for the cumulative analysis of impacts to the provision of telecommunication facilities is the city of West Sacramento. Telephone, cable, and internet services are provided to residents through private providers of these services. The two principal providers in the project area are AT&T and Charter Communications. The construction and expansion of telecommunication facilities for the proposed project would occur on site and is not expected to impact any telephone, cable, or internet services offsite that serve the surrounding areas. Likewise, construction and expansion of telecommunication facilities to the cumulative projects would generally occur on each project site and would not be expected to impact surrounding communities. Therefore, cumulative impacts associated with the relocation or construction of new or expanded telecommunication facilities would be **less than significant**. No mitigation is required.

4.19.8 Level of Significance Prior to Mitigation

The proposed project would result in less than significant impacts related to utilities and service systems.

4.19.9 Regulatory Compliance Measures and Mitigation Measures

4.19.9.1 Regulatory Compliance Measures

The proposed project would be required to comply with the standards set forth in **Regulatory Compliance Measures WQ-3**, as detailed in Section 4.10, Hydrology and Water Quality, which is intended to reduce impacts related to stormwater drainage facilities.

4.19.9.2 Mitigation Measures

The proposed project would not result in significant impacts related to utilities and service systems, and no mitigation is required.

4.19.10 Level of Significance after Mitigation

The proposed project would result in less than significant impacts related to utilities and service systems.

[36] California Department of Resources Recycling and Recovery. (CalRecycle). n.d. SWIS Facility/Site Activity Details: Yolo County Central Landfill (57-AA-0001) Website: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/689?siteID=4033 (accessed February 2026).

4.20 WILDFIRE

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for wildfire to impact the proposed Brar Farms Residential Development Project (proposed project) in the City of West Sacramento (City). This section is based, in part, on information provided in the City's General Plan, the Yolo Multijurisdictional Hazard Mitigation Plan, the City's Emergency Operations Plan (EOP), information provided by the West Sacramento Fire Department (WSFD), applicable provisions of the City's Municipal Code, and federal and State policies.

4.20.1 Scoping Process

Several comments received during the scoping period addressed wildfire. These comments raised concerns about limited evacuation routes and the potential for increased public safety risks during wildfire events.

4.20.2 Methodology

The potential wildfire-related impacts from project-related activities were evaluated qualitatively based on information provided in documents and maps obtained from the City of West Sacramento General Plan, the Yolo Multijurisdictional Hazard Mitigation Plan, and the California Department of Forestry and Fire Protection (CAL FIRE).

4.20.3 Existing Environmental Setting

Fire environments are dynamic systems and include many types of environmental factors and site characteristics. Fires can occur in any environment where conditions are conducive to ignition and fire movement. Areas of naturally vegetated open space typically provide conditions that may be favorable to wildfire spread. The three major components of the fire environment are topography, climate, and vegetation (fuels). The state of each of these components and their interactions with each other determines the potential characteristics and behavior of a fire at any given moment.

A wildfire is a nonstructural fire that occurs in vegetative fuels. Wildfire generally does not include prescribed or controlled fires set by firefighters to manage fuel loads in fire-prone landscapes. Wildfire ignition sources may include lightning, improperly managed campfires, cigarettes, arson, sparks from vehicles, lawnmowers, and other human activities. Wildland fires can transition to urban fires when nearby structures are vulnerable to ignition. Structure ignition depends on a variety of factors and can be prevented through a layered system of protective features including fire-resistive landscapes adjacent to structure(s), application of known ignition-resistive materials and methods, and suitable infrastructure for firefighting purposes. Understanding the existing wildland vegetation and urban fuel conditions on and adjacent to the site is necessary to understand the potential for fire within and around the project site.

CAL FIRE is the primary emergency response agency responsible for fire suppression and prevention in areas identified as State Responsibility Areas (SRAs). CAL FIRE has classified SRAs into Fire Hazard Severity Zones (FHSZs). FHSZs are classified as Moderate, High, and Very High and have been developed using a model that assigns a hazard score based on the factors that influence fire likelihood and fire behavior including fire history, existing and potential fuel (natural vegetation), predicted flame length, blowing embers, terrain, and typical fire weather for the area. Where local

fire protection agencies are responsible for wildfire protection, the lands are classified as Local Responsibility Areas (LRAs). CAL FIRE currently identifies the project site as being within an LRA under the protection of the West Sacramento Fire Department (WSFD). The State Fire Marshal has identified the City of West Sacramento, including the project site, as having no Fire Hazard Severity Zone in an LRA. The nearest FHSZ is located approximately seven miles southeast of the project site, bordering the City of Elk Grove, in unincorporated Sacramento County. This FHSZ is largely classified as Moderate with a portion classified as High.[1] Additionally, the nearest Federal Responsibility Area (FRA) is located approximately eight miles southeast of the project site, while the nearest SRA is located approximately 23 miles southeast of the project site, respectively [2]

The following sections discuss the characteristics of the project site on a regional scale, as well as the site characteristics, local climate, and fire history within and immediately surrounding the site. The intent of evaluating conditions at this macro-scale is to provide a better understanding of the regional fire environment, which is not constrained by property boundary delineations.

4.20.3.1 Topography

Topography influences fire risk by affecting fire spread rates. Typically, steep terrain results in faster fire spread up-slope and slower fire spread down-slope in the absence of wind. Flat terrain tends to have little effect on fire spread, resulting in fires that are driven by wind.

West Sacramento does not have a wildland urban interface (WUI) similar to other areas of Yolo County where there is mountainous terrain and large wildfires are more apt to occur. The relatively level valley floor landscape of West Sacramento leads to very little severe fire behavior. Similar to the rest of West Sacramento, the project site is relatively flat. The City is not heavily forested and primarily experiences grass fires that have potential to threaten homes and infrastructure.

4.20.3.2 Climate

The City of West Sacramento is located in the northern portion of the Central Valley. In the Central Valley, summer temperatures often reach the low 90s, with extreme highs exceeding 100 degrees Fahrenheit. The Sacramento River Delta breeze typically cools the area, with overnight temperatures in the 60s. The average July high temperature in West Sacramento is 94 degrees Fahrenheit, and the average January low temperature is 41 degrees Fahrenheit. The city receives about 20 inches of rain per year.[3]

4.20.3.3 Fuels (Vegetation)

The project site is currently undeveloped, but maintained through seasonal hay farming and regular mowing. Surrounding areas to the north, west, and south are primarily developed and disturbed

1 California Department of Forestry and Fire Protection (CAL FIRE). n.d. Fire Hazard Severity Zone (FHSZ) Mapper. Website: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones (accessed February 2026).

2 *Ibid.*

3 Yolo County. 2018. *2018 Yolo County Operational Area Multi-Jurisdictional Hazard Mitigation Plan*. December.

with some landscaped areas that support non-native/ornamental plant species. Areas to the east of the project site are primarily used for agricultural purposes and are also regularly maintained.

4.20.3.4 Fire History

Fire history is an important component in analyzing wildfire susceptibility. Fire history data provide valuable information regarding fire spread, fire frequency, most vulnerable areas, and significant ignition sources, among others. In turn, this understanding of why fires occur in an area and how they typically spread can then be used for pre-planning and designing defensible communities.

Fire history at the project site and surrounding area was determined by referencing the Fire and Resources Assessment Program (FRAP) database.[4] The FRAP summarizes fire perimeter data dating to the late 1800s. These data provide a summary of recorded fires and can be used to show whether large fires have occurred in the project site area, which is one indication of the likelihood of fires occurring at the project site in the future. This data suggest that West Sacramento has not experienced major wildfires, and no recorded fires have affected the project site. The FRAP map indicates that the project site is within an area historically not prone to wildland fires.[5]

4.20.4 Regulatory Setting

Federal, State, and local regulations and programs related to wildfire that are applicable to the proposed project are described below.

4.20.4.1 Federal Regulations

National Fire Protection Association (NFPA) Code 1710. Code 1710 of the NFPA provides the minimum requirements for the organization and deployment of fire suppression operations, emergency medical operations, and special operations to the public by career fire departments.

National Incident Management System (NIMS). The NIMS provides a systematic, proactive approach to guide government agencies, nongovernmental organizations, and the private sector to work together to prevent, report, recover from, and mitigate the effects of fire incidents, regardless of cause, size, location, or complexity, to reduce the loss of life and property harm to the environment. West Sacramento participates in NIMS, which improves its ability to prepare for and respond to potential incidents and hazard scenarios.

4.20.4.2 State Regulations

CAL FIRE and Resources Assessment Program. CAL FIRE publishes maps that predict the threat of fire for each county within the State. LRAs, SRAs, and Federal Responsibility Areas (FRAs) are classified as either Very High Fire Hazard Severity Zones (VHFHSZ) or non-VHFHSZ based on factors including fuel availability, topography, fire history, and climate. The 2024 Strategic Fire Plan for

[4] California Department of Forestry and Fire Protection (CAL FIRE). n.d. GIS Mapping and Data Analytics. Website: https://www.fire.ca.gov/ Home/What-We-Do/Fire-Resource-Assessment-Program/GIS-Mapping-and-Data-Analytics (accessed February 2026).

[5] *Ibid.*

California was generated by CAL FIRE to provide guidelines and objectives to account for associated fire impacts.

California Fire Code (CFC). The CFC includes regulations for emergency planning, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations, distribution, and spacing. Several fire safety requirements include installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildlife hazard areas.

California Strategic Fire Plan. This statewide plan is a strategic document that guides fire policy for much of California. The plan is aimed at reducing wildfire risk through pre-fire mitigation efforts tailored to local areas through assessments of fuels, hazards, and risks.

California State Hazard Mitigation Plan (SHMP). The purpose of the SHMP is to significantly reduce deaths, injuries, and other losses attributed to natural and human-caused hazards in California. The SHMP provides guidance for hazard mitigation activities emphasizing partnerships among local, State, and federal agencies as well as the private sector.

California Government Code. California Government Code Section 51175 defines VHFHSZs and designates lands considered by the State to be a very high fire hazard. California Government Code Section 51189 directs the Office of the State Fire Marshal to create building standards for wildland fire resistance. The Government Code includes measures that increase the likelihood of a structure withstanding intrusion by fire (e.g., building design and construction requirements that use fire-resistant building materials) and provides protection of structure projections (e.g., porches, decks, balconies, and eaves) and structure openings (e.g., attics, eave vents, and windows).

California Public Resources Code (PRC). The State's Fire Safe Regulations are set forth in PRC Section 4290, which include the establishment of SRAs. PRC Section 4291 sets forth defensible space requirements, which are applicable to anyone that "… owns, leases, controls, operates, or maintains a building or structure in, upon, or adjoining a mountainous area, forest-covered lands, brush covered lands, grass-covered lands, or land that is covered with flammable material" (Section 4291(a)).

Assembly Bill (AB) 337. Per AB 337, local fire prevention authorities and CAL FIRE are required to identify VHFHSZs in LRAs. Standards related to brush clearance and the use of fire-resistant materials in Fire Hazard Severity Zones (FHSZs) are also established.

California Code of Regulations (CCR), Title 8 (Industrial Relations). In accordance with CCR Title 8 Section 1270 and Section 6773 (Fire Prevention, and Fire Protection and Fire Equipment), the California Occupational Safety and Health Administration (Cal/OSHA) establishes fire suppression service standards. The standards range from fire hose size requirements to the design of emergency access roads.

California Code of Regulations (CCR), Title 14 (Natural Resources). Division 1.5 (Department of Forestry and Fire Protection), Title 14 of the CCR establishes a variety of wildfire preparedness, prevention, and response regulations.

California Code of Regulations, Title 19 (Public Safety). Title 19 of the CCR establishes a variety of emergency fire response, fire prevention, and construction and construction materials standards.

California Code of Regulations, Title 24 (California Building Standards Code). The CFC is set forth in Part 9 of the Building Standards Code. The CFC, which is pre-assembled with the International Fire Code (IFC) by the International Code Council (ICC), contains fire-safety building standards referenced in other parts of Title 24.

California Health and Safety Code (HSC) Section 13000 et seq. and California Building Code (CBC). State fire regulations are set forth in Section 13000 et seq. of the California HSC, which is divided into "Fires and Fire Protection" and "Buildings Used by the Public." The regulations provide for the enforcement of the CBC and mandate the abatement of fire hazards. The California HSC establishes broadly applicable regulations, such as standards for buildings and fire protection devices, in addition to regulations for specific land uses, such as childcare facilities and high-rise structures.

California Health and Safety Code (HSC) Division 11 (Explosives). Division 11 of the California HSC establishes regulations related to a variety of explosive substances and devices, including high explosives and fireworks. Section 12000 et seq. establishes regulations related to explosives and explosive devices, including permitting, handling, storage, and transport (in quantities greater than 1,000 pounds).

California Residential Code Section R337. Section R337 establishes minimum standards for the protection of life and property by increasing the ability of a building located in any FHSZ within an SRA or any Wildland Urban Interface (WUI) Fire Area to resist the intrusion of flame or burning embers projected by a vegetation fire and contributes to a systematic reduction in conflagration losses. This section regulates materials and construction methods for exteriors susceptible to wildfire exposure.

Executive Order N-04-19. On January 9, 2019, Governor Newsom announced Executive Order (EO N-04-19, which requires State agencies to identify innovative and sustainable solutions to address the State's wildfire crisis, such as upgraded fire detection technology.

Executive Order N-05-19. On January 9, 2019, Governor Newsom also announced EO N-05-19, which requires CAL FIRE and other State agencies to compile policy and regulatory recommendations concerning wildfire mitigation, emphasizing environmental sustainability and public health. EO N-05-19 requires the incorporation of socioeconomic analysis when conducting risk management of wildfires and mandates that agencies identify geographic areas with populations that are more vulnerable to the impacts of wildfires.

Executive Order N-18-25. In February 2025, Governor Newsom issued EO N-18-25, which is intended to strengthen wildfire resilience in urban and suburban areas by enhancing "Zone 0" defensible space and improving hazard mapping and preparedness systems. EO N-18-25 also

initiated the development of a comprehensive, state-wide wildfire resilience framework through an interagency, stakeholder-led process. Specifically, EO N-18-25 directs the State Board of Forestry and Fire Protection, in consultation with the State Fire Marshal, to finalize formal regulations establishing an ember-resistant zone within 5 feet of structures and instructs the Office of the State Fire Marshal to release updated FHSZ maps for areas within a LRA, which was completed in early 2025.

4.20.4.3 Regional Regulations

County of Yolo Operational Area Multi-Jurisdictional Hazard Mitigation Plan (2018). This plan identifies risks and vulnerabilities, establishes hazard mitigation strategies, describes emergency organization, task assignments, and general procedures, and provides for coordination of response in the event of an emergency. Hazard mitigation goals related to wildfire include the following:

- **Goal 1:** Protection of life during and after the occurrence of disasters from identified hazards.
- **Goal 2:** Preventing loss of life and reducing the impact of damage where problems cannot be eliminated.
- **Goal 3:** Protection of emergency response capability.

4.20.4.4 Local Regulations

City of West Sacramento General Plan 2035. The Safety Element of the City of West Sacramento General Plan 2035 contains the following applicable goals and policies related to wildfire:

- **Goal S-1:** To ensure that City emergency response procedures are adequate in the event of natural or man-made disasters
    - **Policy S-1.6:** The City shall ensure that emergency access is an integral part of the design of all new development.
    - **Policy S-1.7:** The City shall maintain adequate water sources for firefighting purposes and potable water for drinking during and following a disaster.

City of West Sacramento EOP. The EOP was developed for city agencies with emergency services responsibilities and establishes an Emergency Management Organization for the City. This allows for integration and coordination of emergency planning efforts for multiple City agencies. The EOPs serves as an extension of the Yolo County EOPs and the California Emergency Plan.

4.20.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the proposed project would have a significant adverse impact with respect to wildfires if it is located in or near State Responsibility Areas or lands classified as very high fire severity zones and would:

Threshold 4.20.1: Substantially impair an adopted emergency response plan or emergency evacuation plan;

Threshold 4.20.2: Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;

Threshold 4.20.3: Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or

Threshold 4.20.4: Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff post-fire slope instability, or drainage changes.

4.20.6 Project Impacts

Threshold 4.20.1: Would the project impair an adopted emergency response plan or emergency evacuation plan?

***Less Than Significant Impact*.** West Sacramento has adopted an Emergency Operations Plan (EOP),[6] and a Supplemental Evacuation Annex.[7] The EOP establishes the framework for emergency management and interagency coordination using the Standardized Emergency Management System (SEMS) and the Incident Command System (ICS), which allow local agencies to coordinate with Yolo County, regional, and State emergency management agencies during large-scale incidents. The Evacuation Annex functions as a support document to the EOP and provides strategies and protocols for evacuation events within the City. Additionally, the Evacuation Annex identifies procedures for issuing evacuation warnings and orders, coordinating traffic control and route management, and assisting vulnerable populations during emergency evacuations. Furthermore, according to a memorandum prepared by the WSFD,[8] the WSFD states that the City is well prepared to initiate either a full or partial evacuation of residents. In the event of a large-scale emergency, the City's Emergency Operations Center (EOC) would be activated to coordinate decision-making and logistics among City management, public safety, and emergency services. Because each emergency presents unique circumstances, the City does not rely on a fixed or generic route plan; rather, evacuation routes are developed in real time to best manage vehicle and pedestrian movement and maintain public safety.

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6 City of West Sacramento. 2016. *City of West Sacramento Emergency Operations Plan.* December. Website: https://www.cityofwestsacramento.org/home/showpublisheddocument/4268/636408233914630000 (accessed February 2026).

7 City of West Sacramento. 2024. *Evacuation Annex: A Functional Annex to the City of West Sacramento Emergency Operations Plan.* August. Website: https://www.cityofwestsacramento.org/home/showpublisheddocument/20439/638820609837200000 (accessed February 2026).

8 Steve Binns, Fire Chief. 2025. *City of West Sacramento Memorandum. City Evacuation Planning and Response.* March 5.

Additionally, the City has developed 11 pre-planned evacuation zones to assist with helping with the evacuation process, each of these 11 zones specifies primary suggested evacuation routes utilizing the surrounding roads and other geographic features. These zones also include preidentified Rally Points that can assist the residents during an evacuation process. A detailed map of each evacuation zone can be found in **Figure 4.9-1: Evacuation Map i**n Section 4.9, Hazards and Hazardous Materials. As shown in **Figure 4.9-1**, the project site is located within Yolo County Evacuation Zone WSA-283, and Marshall Road is designated as an Evacuation Surface Street. Marshall Road would also provide direct access to nearby evacuation routes, including Southport Parkway and Jefferson Boulevard, ultimately connecting to one of the many evaluation points throughout the City.

Construction. Construction activities that may temporarily restrict vehicular traffic would be required to implement appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures. Typical City requirements include signage and an access plan to ensure continued emergency access during construction. As prescribed in Section 4.17, Transportation, **Regulatory Compliance Measure TRA-1** requires the construction contractors to implement a TMP to manage temporary lane closures along Marshall Road so as not to substantially impair its capacity to accommodate community evacuation and simultaneous emergency access. The proposed project would be required to comply with these requirements, which would maintain emergency access and allow for evacuation if needed during construction activities. Compliance with these requirements would ensure that short-term (construction) impacts related to this issue would be less than significant. With adherence to **Regulatory Compliance Measure TRA-1,** construction of proposed project would not substantially impact existing evacuation plans in the City. Therefore, project construction would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be **less than significant**.

Operation. As discussed in Chapter 3.0, Project Description, the project site would be connected to the surrounding road network by way of four full-access roads: two off Marshall Road, Main Avenue opposite the intersection with Martinique Street and Street B, opposite the intersection with Jamaica Street; and two off Otis Avenue, Street D and Street F.[9] The proposed project would include development of local streets to facilitate circulation throughout the proposed residential development, all of which would be public and meet applicable City Standards.

In the northern portion of the project site, Main Avenue, which runs north-south, would serve as a primary street linking Marshall Road to Otis Avenue, by way of Street D, while providing direct access to Streets C and D. Street C would connect to Streets A and B, and Street D would connect to Streets B, E, F, and G. Main Avenue would also include the installation of a traffic circle at Main Avenue and Street D. In the southern portion of the project site, Street I would connect to Streets B and E and Street H would connect to Streets F and G.

In accordance with the California Fire Code (CFC), the proposed project would include the design, construction, and maintenance of structures, roadways, and facilities to maintain appropriate emergency/evacuation access throughout the project site. Martinique Street, Jamaica Street,

[9] Project street names provided throughout this EIR are temporary placeholders and will be revised during the final design and development of the proposed project.

Street D, and Street F would serve as the first point of access for emergency vehicles, and emergency responders would be able to access the proposed development via the internal circulation system. All roads developed as part of the proposed project would be designed and constructed to provide adequate widths for public safety pursuant to local requirements and in accordance with the CFC to allow fire truck access as shown in **Figure 3-10: Proposed Fire Truck Access,** provided in Chapter 3.0, Project Description.

The project also includes off-site frontage improvements along Marshall Road, consisting of new sidewalks, curbs, and gutters, undergrounding of overhead utilities, street lighting, and landscaping. Similar frontage improvements would be constructed along the Otis Avenue frontage. A single-lane roundabout at the intersection of Marshall Road and Otis Avenue adjacent to the northeastern corner of the project site would also be developed. The primary purpose of this facility is to control existing and project related traffic along Marshall Road and Otis Avenue. Accordingly, these proposed improvements would not physically interfere with the City's adopted EOP or evacuation routes, and the operational function of Marshall Road as an evacuation corridor would be maintained during long-term operations.

As described in Section 4.9 Hazards and Hazardous Materials, in 2025, the City conducted a Preliminary City Evacuation Evaluation to evaluate the time required to evacuate residents from each census tract in West Sacramento in the Preliminary City Evacuation Evaluation.[10] According to the evaluation, the proposed project is located within Census Tract 103.10 (Southport Northwest Bridgeway Lakes area). As of 2025, this census tract contains approximately 1,970 households, 6,382 residents, and approximately 4,343 vehicles that may require evacuation during an emergency event. The evaluation estimates that evacuation of any individual census tract within the City would require less than one hour to clear residents. Specifically, it is estimated that the Southport Northwest Bridgeway Lakes area would be able to clear residents from the Southport Northwest Bridgeway Lakes area in approximately 46 minutes (see **Table 4.9.A**). A citywide evaluation was also conducted to determine the evacuation time needed to clear all residents during an evacuation of the entire city. According to the evaluation, it is estimated that it would take approximately 2.6 hours to evacuate all residents in the city under a full citywide evacuation scenario, including those within the Southport Northwest Bridgeway Lakes area by utilizing the nearest available roadway gateways for exiting City limits, which connect local streets in the Southport area to the regional roadway network. These gateways include the following:

- Gateway 1: U.S. Highway 50 (US-50) Westbound at Harbor Boulevard (northbound Loop On-Ramp) with a capacity of 1,900 vehicles/hour
- Gateway 2: US-50 eastbound at Harbor Boulevard with a capacity of 2,200 vehicles/hour
- Gateway 3 US-50 eastbound at Jefferson Boulevard with a capacity of 1,500 vehicles/hour

[10] City of West Sacramento, Community Development Department, Transportation and Mobility Division. 2025. *Preliminary City Evacuation Evaluation*. June.

- Gateway 4: Jefferson Boulevard (State Route 94 [SR-84]) to the south with a capacity of 1,700 vehicles/hour

The evaluation concluded that these four gateways would have adequate access to accommodate the total number of vehicles that would utilize these gateways within the Southport Northwest Bridgeway Lakes area under the existing condition.

Upon full build out of the proposed 259 single-family homes, it is anticipated that the proposed project would result in a net increase of approximately 725 residents, increasing the population of the Southport Northwest Bridgeway Lakes area from 6,382 residents to approximately 7,107 residents. Although, the exact number of vehicles generated by the proposed project cannot be ascertained at this time, utilizing the average of 2.5 vehicles per household per the Preliminary City Evacuation Evaluation, it is assumed that the proposed project could generate approximately additional 648 vehicles,[11] increasing the total number of vehicles within of Census Tract 103.10 from 4,343 vehicles to approximately 4,991 vehicles.[12] Subsequently, the project would represent an estimated 15 percent increase in vehicles likely to be used during an evacuation in the Southport Northwest Bridgeway Lakes area. Given that evacuation traffic from the Southport Northwest Bridgeway Lakes area would continue to be distributed across the four identified evacuation gateways, including US-50 westbound at Harbor Boulevard with a capacity of 1,900 vehicles per hour, US-50 eastbound at Harbor Boulevard with a capacity of 2,200 vehicles per hour, US-50 eastbound at Jefferson Boulevard with a capacity of 1,500 vehicles per hour, and Jefferson Boulevard SR-84 to the south with a capacity of 1,700 vehicles per hour, the combined capacity of these evacuation gateways would be approximately 7,300 vehicles per hour. This combined capacity would remain sufficient to accommodate the additional 648 vehicles generated by the proposed project and would not significantly impact the capacity of evacuation gateways serving the Southport Northwest Bridgeway Lakes area or the City.

As previously stated, it is estimated that the Southport Northwest Bridgeway Lakes area would be able to clear residents in approximately 46 minutes under existing conditions. Upon full buildout of the proposed project, approximately 648 vehicles would be added to the Southport Northwest Bridgeway Lakes area, increasing evacuation demand and resulting in an estimated increase in evacuation clearance time of approximately 7 minutes, for a total estimated clearance time of approximately 53 minutes within the area. Although the proposed project would incrementally increase evacuation clearance time within the Southport Northwest Bridgeway Lakes area, this change does not represent a substantial increase and would not materially affect the overall citywide evacuation timeframe of approximately 2.6 hours under a full citywide evacuation scenario. In addition, the Southport Northwest Bridgeway Lakes area and the City of West Sacramento would continue to be managed under the City's EOP and Evacuation Annex, which guide and regulate evacuation events within the City and provide for coordinated emergency response, traffic management, and evacuation routing based on incident-specific conditions.

[11] 259 residential units x 2.5 average 2.5 vehicles per households ≈ 648 vehicles

[12] 4,343 vehicles in Census Tract 103.10+648 vehicles generated by the proposed project = 4,991 total vehicles

With adherence to **Regulatory Compliance Measure TRA-1,** construction of the proposed project would not substantially impact existing evacuation plans in the City. During long-term operation, the incremental increase in evacuation demand associated with full buildout, including approximately 648 additional vehicles and the resulting increase in clearance time of approximately 7 minutes, would be accommodated within the existing evacuation gateway network and would not result in a substantial change in evacuation system performance or capacity. Therefore, project construction and operation would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be **less than significant**.

Threshold 4.20.2: Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less Than Significant Impact. As stated above, the project site is not located in a VHFHSZ and although the project site is surrounded by agricultural and urban development, the area is not prone to wildfires. The proposed project would also change the land use designation from Rural Estate (RE) to Low Density Residential (LR) and rezone the site from Residential Rural Estates (RE) to Residential One Family (R-1-A), allowing the subdivision of approximately 60 acres into 259 lots for future development of single-family homes and 15 open space lots, consisting a 0.68-acre Central Park, a 0.14-acre parklet located at the corner of Marshall Road and Otis Avenue, and 1.8 acres of landscaped lots distributed throughout the proposed residential development to provide greenspace and buffers. Additionally, the open space areas would include a 4.02-acre detention basin, which would also serve as a recreational field during dry seasons. Landscaping, roadway, and utility improvements would be installed within the project site. This change would ameliorate wildfire risks by increasing impervious surfaces throughout the project site and reducing the amount of fuel on the project site that would otherwise be susceptible to burning. Furthermore, the recreational and open space areas within the proposed project, including the recreational elements of the detention basin, park, and landscaped lots would be privately owned and maintained by a future Homeowners Association (HOA). The Reclamation District No. 900 (RD 900) would maintain the stormwater and drainage components of the detention basin and said maintenance would be funded by the RD 900 property assessments and to RD 900's standards.

The project site is relatively flat (8–10 feet above mean sea level with a gentle southwest slope), and no steep slopes exist on or adjacent to the site. Thus, topography would not contribute to increased fire risk. Additionally, compliance with applicable building and fire codes, combined with existing water infrastructure to support fire suppression, would further ensure that new residential uses are not exposed to significant wildfire hazards. Accordingly, the proposed land use changes would not exacerbate wildfire risk or expose project occupants to significant wildfire-related hazards, including pollutant concentrations from smoke or uncontrolled wildfire spread. Impacts would be **less than significant**, and no mitigation is required.

Threshold 4.20.3: Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less Than Significant Impact. Project development would involve the construction of infrastructure on site to support the proposed project, including residential roads, and utility connections. As stated in Section 4.19, Utilities and Service Systems, the proposed project would not result in the need for expanded utility infrastructure off site and would meet all of West Sacramento's Municipal requirements.

The proposed project would include connections to the existing PG&E electrical transmission lines that run along the southern and northern edges of the project site. The proposed project would not include the use of natural gas. Additionally, the proposed project would include offsite improvements which would include new sidewalks, curbs, and gutter infrastructure, as well as undergrounding of all overhead utilities, construction of street lighting, and installation of landscaping. Given the low potential for wildfire to impact the project site and surrounding area, these improvements would not exacerbate fire risk or result in impacts to the environment. Although utilities, including water facilities, sewer facilities, storm drain lines, and power lines would be modified and/or extended throughout the project site, these improvements would be underground and would not exacerbate fire risk. All utility lines, pipes, utility junction boxes, and transformers would be located underground. Project design and implementation of utility improvements would be reviewed and approved by the City's Public Works Department as part of the project approval process to ensure the proposed project is compliant with all applicable fire codes, design standards, and regulations.

As stated in the Chapter 3.0, Project Description, the proposed project includes four full-access roads: two located off Marshall Road, one at Martinique Street and one at Jamaica Street, and two located off Otis Avenue, one at D Street and one at F Street. The proposed project would also construct local streets to facilitate circulation throughout the proposed residential development, all of which will be public and meet applicable City Standards and would be designed to allow fire truck access throughout the development.

Additionally, the proposed project would include approximately 6.65 acres of open space consisting of the Central Park, parklet, landscape lots, and the detention basin. Landscaping would be installed throughout the proposed residential component and open space areas. Excluding the detention basin, recreational and open space areas within the proposed project, including parks and landscaped lots, may be privately owned and maintained by a future HOA. Therefore, the proposed project would not require the installation or maintenance of associated infrastructure which would exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

Because the installation of all project-related utility improvements would be implemented in an urbanized setting in accordance with the current CBC, CFC, and applicable local ordinances, impacts related to the installation or maintenance of infrastructure that may exacerbate fire risk or result in temporary or ongoing impacts to the environment would be **less than significant**, and no mitigation is required.

Threshold 4.20.4: Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff post-fire slope instability, or drainage changes?

Less Than Significant Impact. Landslides and other forms of mass wasting, including mudflows, debris flows, and soil slips, occur as soil moves downslope under the influence of gravity. Landslides are frequently triggered by intense rainfall or seismic shaking but can also occur as a result of erosion and downslope runoff caused by rain following a fire. The project site has not been evaluated by the California Geological Survey for landslide zones; however, according to the United States Geological Survey Landslide Susceptibility Map,[13] the potential for landslides to affect the project site is considered low. In the extremely unlikely event that a wildfire should spread to the project site, it would not expose any on-site slopes to erosion and potential failure because the project site does not contain any steep slopes that are prone to landslides. The proposed project would not expose people or structures to significant risks, including downslope landslides, as a result of runoff, post-fire slope instability, or drainage changes. There would be no impact to project occupants or nearby residents or workers related to post-wildfire landslide risks, and no mitigation is required.

In the unlikely event of wildfire, the project would not generate additional runoff or sedimentation that would contribute to downstream flooding or erosion due to the absence of steep slopes and the inclusion of drainage improvements to manage on-site runoff. Therefore, the project would not expose occupants or structures to significant risks associated with downslope or downstream flooding, post-fire slope instability, or drainage changes. Impacts would be **less than significant**, and no mitigation is required.

4.20.7 Cumulative Impacts

Less Than Significant Impact. As defined in Section 15355(b) of the *State CEQA Guidelines*, cumulative impacts refer to the incremental effects of an individual project added to other closely related past projects, current projects, and probable future projects. The cumulative study area for wildfire is described in Chapter 4.0; the cumulative project list is provided in Chapter 4.0, **Table 4.A**, and a map of the cumulative project locations is provided in Chapter 4.0, **Figure 4-1**.

As detailed in this section, the proposed project would result in less than significant impacts related to wildfire. Additionally, all discretionary private development and public works projects within the cumulative study area would be required to comply with CEQA. In this way, potential impacts related to wildfire would be evaluated and mitigated by each individual project. Additionally, all discretionary private development and public works projects within the cumulative study area would be required to adhere to City, County, State, and federal regulations designed to reduce and/or avoid impacts related to wildfire including flooding hazards and landslides after a wildfire event. Since all projects within the cumulative study area would be required to implement appropriate mitigation measures and adhere to applicable regulations, implementation of the

[13] United States Geological Survey (USGS). 2026. U.S. *Landslide Inventory and Susceptibility Map.* Website: https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=ae120962f459434b8c904b456c82669d (accessed February 2026).

proposed project, when evaluated in combination with the development of projects listed in **Table 4.A**, would not contribute to a cumulatively considerable impact related to wildfire. Cumulative impacts related to wildfire would be **less than significant**, and no mitigation is required.

4.20.8 Level of Significance Prior to Mitigation

The proposed project would result in less than significant impacts related to wildfire.

4.20.9 Regulatory Compliance Measures and Mitigation Measures

4.20.9.1 Regulatory Compliance Measures

The proposed project would also be required to comply with the standards set forth in **Regulatory Compliance Measure TRA-1,** as detailed in Section 4.17 Transportation and Traffic, which is intended to reduce impacts related to evacuation.

4.20.9.2 Mitigation Measures

The proposed project would not result in potentially significant impacts related to wildfire, and no mitigation is required.

4.20.10 Level of Significance after Mitigation

The proposed project would result in less than significant impacts related to wildfire.

5.0 ALTERNATIVES

5.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) include a discussion of reasonable project alternatives that would "feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant impacts of the project, and evaluate the comparative merits of the alternatives" (*State CEQA Guidelines*, Section 15126.6). This chapter identifies potential alternatives to proposed project, evaluates the potential impacts of each alternative, and compares the potential impacts of each alternative against the proposed project's impacts, as required by CEQA.

Key provisions of the *State CEQA Guidelines* on alternatives (Section 15126.6[b] through [f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in the EIR:

- The discussion of alternatives shall focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly (15126.6[b]).

- The specific alternative of 'no project' shall also be evaluated along with its impact (15126.6[e][1]). The 'no project' analysis shall discuss the existing conditions at the time the Notice of Preparation is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (15126.6[e][2]).

- The range of alternatives required in an EIR is governed by the 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent) (15126.6[f]).

- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (15126.6[f][2][A]).

- If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location (15126.6[f][2][B]).

- An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (15126.6[f][3]).

Pursuant to the guidelines stated above, a range of alternatives to the proposed project is considered and evaluated in this EIR. These alternatives were developed in the course of project planning and environmental review. The discussion in this section provides:

1. A description and analysis of impacts for each of the alternatives considered;

2. Comparative analysis of each alternative that focuses on the potentially significant unavoidable environmental impacts of the proposed project, e.g., vehicle miles traveled (VMT) (the purpose of this analysis is to determine whether alternatives are capable of eliminating or reducing the significant environmental impacts of the project to a less than significant level); and

3. Conclusions regarding the alternatives: (1) ability to avoid or substantially lessen the significant unavoidable impacts of the project; (2) ability to attain the project objectives (as stated below); and (3) merits compared to the merits of the proposed project.

5.2 PROPOSED PROJECT

As described in Chapter 3.0, Project Description, of this Draft EIR, the proposed Brar Farms Residential Development Project (proposed project) involves the subdivision of an approximately 60-acre property to create 259 lots for future single-family homes, comprising approximately 34.78 acres of residential development and 15 open space lots totaling 6.65 acres. The open space lots would include a 0.68-acre Central Park, a 0.14-acre parklet at the corner of Marshall Road and Otis Avenue, and 1.81 acres of landscaped lots, including a roundabout, distributed throughout the proposed development to provide greenspace and buffers. Additionally, the open space areas would include a 4.02-acre detention basin, which would also serve as a recreational field during dry seasons.

The proposed project would require an Amendment to the City of West Sacramento (City) General Plan and an Amendment to the Southport Framework Plan to change the designations from Rural Estate (RE) to Low Density Residential (LR). It would also require a Zoning Map/Code Amendment to rezone the site from Residential Rural Estate (RE) to Residential One Family (R-1-A). According to the City's General Plan, the LR designation is intended to provide for single-family detached and attached homes, secondary residential units, public and quasi-public uses, and similar compatible uses, allowing a maximum residential density of 6.0 dwelling units per acre (DUA). Additionally, the City's Zoning Code designates the R-1-A zoning district for single-unit dwellings while preserving the characteristics of existing single-unit neighborhoods. The R-1-A zoning district also permits public and quasi-public uses, as well as other compatible uses suited for a medium-density residential environment, with allowed residential densities ranging from 1.1 to 6.0 dwelling units per gross acre.

As such, these amendments would allow the project to be consistent with the City's Zoning Code and planning documents governing the project site.

5.2.1 Project Objectives

As discussed in Section 3.4, Project Objectives, of this EIR, the following project objectives have been established to aid decision-makers in their review of the proposed project and its associated environmental impacts:

- To provide a mix of land uses and residential lot sizes with an innovative design approach to residential development.
- To provide open space, green areas, recreational amenities, and multi-use pathways and create an overall design that advances "smart growth" principles.
- To create a development plan that is focused on connectivity within and to adjacent neighborhoods and open spaces.
- To enhance the City's bike and pedestrian network of paths and dedicated bike routes.
- To create a mix of lot sizes and housing types integrated within open space land uses in a functional and logical manner.
- To create a creative approach to sustainable neighborhood design by integrating landscape design and environmental engineering practices into a comprehensive neighborhood plan.
- To provide a sufficient number of new housing units to assist the City in satisfying its RHNA goals.
- To provide a sufficient number of residential units to support necessary improvements to public facilities.

5.2.2 Project-Related Impacts

As described in Chapter 4.0, Existing Environmental Setting, Environmental Analysis, Impacts, and Mitigation Measures, of this EIR, the proposed project would result in no impacts related to the following environmental factors: mineral resources. The proposed project would result in less than significant impacts related to the following environmental factors: aesthetics, agriculture, energy, greenhouse gas emissions, land use, noise (with implementation of regulatory compliance measures), population and housing, public services (with implementation of regulatory compliance measures), recreation (with implementation of regulatory compliance measures), and utilities and service systems. The proposed project would result in less than significant impacts with implementation of mitigation related to the following environmental factors: air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality (except under Threshold 4.10.4), tribal cultural resources, transportation (except under Threshold 4.17.2), and wildfire. Refer to Chapter 4.0 of this EIR for a description of the required regulatory compliance measures and prescribed mitigation measures.

The proposed project would result in significant and unavoidable impacts related to flooding and VMT.

- As discussed in Section 4.10 Hydrology and Water Quality, the entire city is within the natural floodplain of the Sacramento River and could be subject to inundation if the levees were to fail. Although adherence to Chapter 15.50 of the City's Municipal Code, as detailed in **Regulatory Compliance Measure WQ-4,** would require either constructing flood management improvements or other mitigation measures, beyond those set forth in City's Floodplain Management Ordinance (Title 18 of the Municipal Code) or paying the "in-lieu" flood management fee in an amount established by resolution of the City council, no mitigation would reduce the potential flooding impact to less than significant. Accordingly, because the project site is located in a flood hazard zone (i.e., 200-year flood plain as mapped by the Department of Water Resources (DWR) pursuant to Senate Bill [SB] 5) and inundation at the project site could occur during a flood event, the proposed project could result in the release of pollutants due to inundation. Therefore, impacts would be **significant and unavoidable**.

- As discussed in Section 4.17, Transportation, of this Draft EIR, the proposed project would generate a residential vehicle miles traveled (VMT) per capita of 20.88, which is higher than both the City's 85 percent residential VMT per capita threshold (16.43) and the regional threshold (17.43). Although the project would employ specific design features and proposes several VMT reduction measures, these measures would only result in an estimated 3.03 percent reduction in residential VMT per capita. Therefore, the proposed project would result in a **significant and unavoidable** transportation impact related to VMT. As there are no additional feasible mitigation measures that would reduce project VMT, operation of the proposed project would result in a result in a **cumulatively significant and unavoidable transportation** impact related to VMT.

5.3 ALTERNATIVES INITIALLY CONSIDERED BUT REJECTED FROM FURTHER CONSIDERATION

Section 15126.6(c) of the *State CEQA Guidelines* suggests that EIRs identify any alternatives that were considered by the Lead Agency but were rejected during the scoping process and briefly explain the reasons underlying the Lead Agency's determination. In evaluating an appropriate range of alternatives to the proposed project, a number of alternatives were considered and rejected for differing reasons by the City of West Sacramento. Variables that were considered in determining feasible alternatives included, but were not limited to, site suitability, economic viability, available infrastructure, general plan consistency, environmental impacts, and consistency with the project objectives.

Three alternatives were considered but ultimately rejected for further analysis in this Draft EIR, as described below.

5.3.1 Alternative Sites

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant impacts of the project. The key question and first step in the analysis is whether any of the significant impacts of the project would

be avoided or substantially lessened by relocating the project. Only locations that would avoid or substantially lessen any of the significant impacts of the project need be considered for inclusion in the EIR (*State CEQA Guidelines*, Section 15126.6[f][2][A]). Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, General Plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the applicant can reasonably acquire, control, or otherwise have access to the alternative site (*State CEQA Guidelines*, Section 15126.6[f][1]). If it is determined that no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion (*State CEQA Guidelines*, Section 15126.6[f][2][B]).

No alternative locations where the proposed project could be undertaken are analyzed in this Draft EIR because no feasible alternative sites were identified that would avoid or substantially lessen the environmental impacts of the proposed project while still meeting the majority of the project objectives. Key objectives of the proposed project include providing a mix of land uses and residential lot sizes with an innovative design approach to residential development; incorporating open space, green areas, recreational amenities, and multi-use pathways to create an overall design that advances smart growth principles; and creating a development plan focused on connectivity within and to adjacent neighborhoods and open spaces. Additional objectives include enhancing the City's bicycle and pedestrian network of paths and dedicated bike routes; integrating a mix of lot sizes and housing types with open space land uses in a functional and logical manner; and promoting a creative approach to sustainable neighborhood design by incorporating landscape design and environmental engineering practices into a comprehensive neighborhood plan. The project also seeks to provide a sufficient number of new housing units to assist the City in meeting its Regional Housing Needs Allocation (RHNA) goals and to support necessary improvements to public facilities. Furthermore, development of the proposed project on an alternative site would likely result in many of the same environmental impacts as development of the proposed project on the project site. Therefore, this alternative was rejected from further consideration.

5.3.2 Higher Density Transit Oriented Development (TOD) Alternative

Under the Higher Density Transit Oriented Development (TOD) Alternative, the project would build higher density housing and associated mixed use development typical of TOD. This alternative was considered for its potential to reduce impacts associated with VMT. The City has similar projects in planning in the Washington District and the Gateway District. However, TOD is generally located within close distance (less than 0.5 mile or a ten minute walk) of a transit hub. The City's TOD projects are located in areas with existing dense development and high volume transit, as well as ready access to job centers in the Central Business District and downtown Sacramento. The project site is situated in a semi-rural/suburban environment, surrounded by lower density residential uses, and while served by transit, is not located near transit hubs. While the Higher Density TOD Alternative would achieve several of the project objectives, higher density TOD would be incongruous with the project area and surrounding infrastructure and would likely not reduce VMT. Therefore, this alternative was rejected from further consideration.

5.3.3 No Build Alternative

Under the No Build Alternative, no new development would occur on the project site and there would be no impacts. Unlike Alternative 1: No Project Alternative, carried forward for further analysis, the No Build Alternative would leave the project site as it is under existing conditions. However, the project site is currently designated Rural Estate (RE) in the General Plan and zoned Residential Rural Estates (RE), anticipating eventual development of residential uses, including any associated impacts. Because residential development is allowed by right under the site's existing zoning, it is not reasonable to assume that the site would remain vacant indefinitely under the No Build Alternative. Moreover, without redesignating the project site's land use and rezoning, the City could not require the site to remain vacant, and it would be reasonable to assume that residential development would eventually occur under current zoning even if the proposed project is not approved. However, for the purposes of this analysis, the No Build Alterative would develop no residential uses, would not help the City in satisfying its RHNA goals, and would not enhance the City's bike and pedestrian network. The No Build Alternative would meet none of the project objectives. Therefore, this alternative was rejected from further consideration.

5.4 ALTERNATIVES UNDER CONSIDERATION

Section 21100 of the Public Resources Code (PRC) and Section 15126 of the *State CEQA Guidelines* require an EIR to identify and discuss a No Project Alternative and a reasonable range of alternatives to the proposed project that would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant environmental impacts. Based on the criteria listed above, the following three alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the basic objectives of the proposed project but that may avoid or substantially lessen any of the significant impacts of the proposed project. Therefore, the alternatives considered in this EIR include the following:

- **Alternative 1 - No Project Alternative:** CEQA requires analysis of a "No Project" Alternative. The purpose of describing and analyzing a No Project Alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. According to *State CEQA Guidelines* Section 15126.6(e)(3)(C), the lead agency should proceed to analyze the impacts of the No Project Alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. Alternative 1 would not require the subdivision of an approximately 60-acre project site into 259 lots for future development of single-family homes, 15 lots for open space and park use, and associated landscaping, roadway, and utility improvements. The project site would therefore remain undeveloped and continue to be seasonally farmed for hay by a volunteer farmer and maintained by the property owner in the near term. Under Alternative 1, the project site would also continue to be designated as Rural Estates (RE) in the City's General Plan and the Southport Framework Plan, as well remain zoned RE under the City's Zoning Code. This would allow residential development of up to one unit per 2.5 acres. In addition, the RE zoning district would permit limited agricultural uses, public and quasi-public uses, and other uses that may be appropriate in a rural residential area. Under the No Project Alternative, a future development

proposal by either the property owner or another entity could develop the site per the requirements of the RE zoning district, with approximately 24 single-family residential lots, each up to approximately 2.5 acres in size, with limited on-site infrastructure.

- **Alternative 2 - Reduced Density / Rural Buffer:** Similar to the proposed project, Alternative 2 would be located on the same approximately 60-acre site and would include similar landscaping, roadway, and utility improvements as the proposed project. The proposed 15 open space lots totaling approximately 6.65 acres, including the 0.68-acre Central Park, 0.14-acre parklet, 1.81 acres of landscaped lots, and 4.02-acre detention basin would also be retained under this alternative. The proposed off-site frontage improvements along the north side of the project site on Marshall Road and along Otis Avenue frontage would also be constructed under this alternative. In addition, the single-lane roundabout at the intersection of Marshall Road and Otis Avenue adjacent to the northeastern corner of the project site would also be developed. However, under Alternative 2, the proposed lots adjacent to the existing residential development to the south and west would be designated Residential-Rural Agricultural (RRA). The RRA zoning district is intended for rural residential development with limited agricultural uses and limited on-site water and sewer systems. This designation generally provides for between 0.5 and 1 DUA, with a minimum lot size of one acre. The remaining portions of the project site would be designated Residential One Family (R-1-B). The R-1-B district provides for single-unit dwellings and compatible public and quasi-public uses while maintaining the character of existing single-family neighborhoods. Under the R-1-B standards, minimum lot sizes would be 6,000 square feet, compared to the 5,000-square-foot minimum under the proposed R-1-A zoning, and residential densities would range from 1.1 to 6.0 dwelling units per gross acre, consistent with the City's LR General Plan land use designation. Additionally, similar to the proposed project, Alternative 2 would require an Amendment to the City's General Plan and an Amendment to the Southport Framework Plan to change the current RE designation to LR for the portion of the site proposed for R-1-B development and to RRA for the buffer area. A Zoning Map/Code Amendment would also be required to rezone the site from RE to a combination of RRA and R-1-B districts. In addition, under this alternative, it is assumed that total number of residential units would be reduced by approximately 20 percent, resulting in an estimated 207 lots, compared to 259 lots under the proposed project.

- **Alternative 3 - Mixed Use Alternative:** Similar to the proposed project, Alternative 2 would be located on the same approximately 60-acre site and would include similar landscaping, roadway, and utility improvements as the proposed project. The proposed 15 open space lots totaling approximately 6.65 acres, including the 0.68-acre Central Park, 0.14-acre parklet, 1.81 acres of landscaped lots, and 4.02-acre detention basin would also be retained under this alternative. The proposed off-site frontage improvements along the north side of the project site on Marshall Road and along Otis Avenue frontage would also be constructed under this alternative. In addition, the single-lane roundabout at the intersection of Marshall Road and Otis Avenue adjacent to the northeastern corner of the project site would also be developed. The proposed frontage improvements along Marshall Road and Otis Avenue would be constructed under this alternative. Under Alternative 3, roughly 24 residential lots, primarily 5,000-square-foot lots and one 7,200-square-foot lot, would be replaced by a 4-acre neighborhood-serving retail component. The retail area would be bounded by the existing retention pond at Bridgeway Lakes

Community Park to the west and Marshall Road to the north. To accommodate the retail component, this 4-acre area would require an Amendment to the City's General Plan and an Amendment to the Southport Framework Plan to change the designation from RE to Mixed Use Neighborhood Commercial (MU-NC), as well as a Zoning Map/Code Amendment to rezone the area from RE to MU-NC. The MU-NC zone is intended to provide areas for a mix of medium-density residential units that support commercial retail, office, and open space uses. This zone allows for lower-intensity mixed-use development with residential townhomes, condos, and apartments integrated with pedestrian-oriented shopping, office, and open space. Uses are intended to provide essential daily services, retail needs, and recreational amenities within walking distance of the surrounding neighborhood. Residential densities range from 12 to 60 units per acre. This rezoning could also accommodate potential future higher-density residential development. Additionally, under Alternative 3, the remaining 234 residential lots would maintain the same lot size configurations, primarily ranging from 5,000 to 7,200 square feet, with ten oversized lots reaching up to 14,800 square feet. Similar to the proposed project, this alternative would also require an Amendment to the City's General Plan and an Amendment to the Southport Framework Plan to change designations from RE to LR, and a Zoning Map/Code Amendment to rezone the site from RE to R-1-A for the remainder of the project site.

For the purpose of this analysis, it is assumed that all of the alternatives would comply with applicable federal, State, and local regulations, policies, and ordinances. The alternatives are further described below and their potential impacts compared to those of the proposed project.

5.4.1 Alternative 1: No Project Alternative

5.4.1.1 Description

In accordance with Section 15126.6(e) of the *State CEQA Guidelines*, the "No Project" Alternative should evaluate the existing conditions of the site at the time the Notice of Preparation is published as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. Alternative 1 would not require the subdivision of an approximately 60-acre project site into 259 lots for future development of single-family homes, 15 lots for open space and park use, and associated landscaping, roadway, and utility improvements. The project site would therefore remain undeveloped and continue to be seasonally farmed for hay by a volunteer farmer and maintained by the property owner in the near term. Under Alternative 1, the project site would also continue to be designated as RE in the City's General Plan, the Southport Framework Plan, and the City's Zoning Code, which would allow residential development of up to one unit per 2.5 acres. In addition, the RE zone would also permit limited agricultural uses, public and quasi-public uses, and other uses that may be appropriate in a rural residential area. Under the No Project Alternative, a future development proposal by either the property owner or another entity could develop the site under the existing RE zoning designation with approximately 24 single-family residential lots, each up to approximately 2.5 acres in size, with limited on-site infrastructure.

The potential impacts associated with Alternative 1 are described below. Regulatory compliance and mitigation measures associated with the proposed project would not be applicable to the No Project Alternative, as the No Project Alternative assumes foreseeable buildout under existing conditions.

Aesthetics. Alternative 1 would not require the subdivision of an approximately 60-acre project site into 259 lots for future development of single-family homes, 15 lots for open space and park use, and associated landscaping, roadway, and utility improvements. The project site would therefore remain undeveloped and continue to be seasonally farmed for hay by a volunteer farmer and maintained by the property owner in the near term. Under Alternative 1, the project site would also continue to be designated as RE in the City's General Plan, the Southport Framework Plan, and the City's Zoning Code. Therefore, Alternative 1 would not conflict with applicable zoning or other regulations governing scenic quality.

Although Alternative 1 would not result in development of the proposed project, a future development proposal by either the property owner or another entity could develop the site under the existing RE zoning designation with approximately 24 single-family residential lots, each approximately 2.5 acres in size, with rural roadway access and limited on-site infrastructure. Compared to the proposed project, the future buildout of 24 single-family residential lots would be substantially less intensive. Due to the reduced number of residential units proposed under this alternative, this alternative would result in less density within the project site. Similar to the proposed project, development of Alternative 1 would alter the existing visual condition of the project site through the introduction of development on currently vacant land. Alternative 1 would comply with the City's General Plan goals and policies regarding aesthetics and applicable lighting standards in Section 17.22.080, Lighting and Illumination, of the City's Municipal Code, and construction activities would be limited to daytime hours. Overall, impacts to aesthetics under Alternative 1 would be less than those of the proposed project due to the reduced scale of potential development.

Agriculture and Forestry Resources. Alternative 1 would not require the subdivision of an approximately 60-acre project site into 259 lots for future development of single-family homes, 15 lots for open space and park use, and associated landscaping, roadway, and utility improvements. The project site would therefore remain undeveloped and continue to be seasonally farmed for hay by a volunteer farmer and maintained by the property owner in the near term. In addition, the project site would continue to be designated as RE in both the City's General Plan, the Southport Framework Plan and the City's Zoning Code. However, under Alternative 1, a future development proposal by either the property owner or another entity could develop the site under the existing RE zoning designation with approximately 24 single-family residential lots, each approximately 2.5 acres in size, with rural roadway access and limited on-site infrastructure. Overall, impacts to agriculture and forestry resources under Alternative 1 would be less than those of the proposed project due to the reduced scale of potential development.

Air Quality. Alternative 1 would not require the subdivision of an approximately 60-acre project site into 259 lots for future development of single-family homes, 15 lots for open space and park use, and associated landscaping, roadway, and utility improvements. The project site would therefore remain undeveloped and continue to be seasonally farmed for hay by a volunteer farmer and maintained by the property owner in the near term. However, under Alternative 1, a future development proposal by either the property owner or another entity could develop the site under the existing RE zoning designation with approximately 24 single-family residential lots, each approximately 2.5 acres in size, with rural roadway access and limited on-site infrastructure.

Therefore, similar to the proposed project, Alternative 1 would involve construction and future operational activities on the project site. Due to the reduced number of residential units proposed under this alternative, this alternative may result in reduced construction and operational emissions, including those due to vehicle trips, compared to those under the proposed project. However, construction of the proposed project would still require implementation of Yolo-Solano Air Quality Management District's (YSAQMD's) Rule 2.11 to reduce fugitive dust impacts and short-term construction period air quality impacts. All other air quality impacts would be reduced compared to those of the proposed project and would be less than significant. As a result, this alternative would result in fewer impacts when compared to the proposed project.

Biological Resources. Alternative 1 would not require the subdivision of an approximately 60-acre project site into 259 lots for future development of single-family homes, 15 lots for open space and park use, and associated landscaping, roadway, and utility improvements. The project site would therefore remain undeveloped and continue to be seasonally farmed for hay by a volunteer farmer and maintained by the property owner in the near term. However, under Alternative 1, a future development proposal by either the property owner or another entity could develop the site under the existing RE zoning designation with approximately 24 single-family residential lots, each approximately 2.5 acres in size, with rural roadway access and limited on-site infrastructure.

Therefore, Alternative 1 would develop the same project site as the proposed project but at a lower residential density. Construction activities under Alternative 1 would be similar in type and extent to the proposed project but would be shorter in duration with reduced intensity due to development of fewer residential units. Alternative 1 would also involve disturbance of the project site, resulting in the conversion of ruderal grassland to developed land uses and the permanent loss of potential foraging habitat for special-status wildlife. Accordingly, like the proposed project, development of Alternative 1 could adversely affect special-status wildlife species as a result of project-related activities and would also be required to implement Avoidance and Mitigation Measures (AMMs) consistent with the Yolo Habitat Conservation Plan/ Natural Community Conservation Plan (HCP/NCCP). Alternative 1 would be subject to the provisions of the City's Tree Preservation Ordinance and the Migratory Bird Treaty Act, and California Fish and Game Code. Because Alternative 1 would be located on the same project site, it would also be subject to Yolo HCP/NCCP and all applicable AMMs. In addition, like the proposed project, Alternative 1 would not result in adverse effects on any riparian habitat or other sensitive natural community or result in adverse effects on state or federally protected wetlands as none of these resources are present at the project site. Overall, impacts to biological resources under Alternative 1 would be less than those of the proposed project due to the reduced scale of potential development.

Cultural Resources. Under Alternative 1, the project site would remain undeveloped and consistent with existing conditions in the near term. However, under Alternative 1, a future development proposal by either the property owner or another entity could develop the site under the existing RE zoning designation with approximately 24 single-family residential lots, each approximately 2.5 acres in size, with rural roadway access and limited on-site infrastructure. Alternative 1 would therefore result in fewer residential units compared to the proposed project. In addition, Alternative 1 would not require the undergrounding or construction of new utilities or new or expanded entitlements.

Future development under this scenario would involve ground-disturbing activities such as grading, excavation, and utility installation that could result in impacts to previously undiscovered tribal cultural resources. While the overall development program would be smaller than the proposed project, the types of ground-disturbing activities would be generally similar in nature but reduced in overall scale and intensity. In addition, similar to the proposed project, Alternative 1 would not cause a substantial adverse change in the significance of a historical resource as there are no "historical resources" on the project site. Alternative 1 would have the potential to impact previously undiscovered archaeological resources and human remains because it would require ground-disturbing activities. In the event that previously undiscovered cultural resources or human remains are encountered, compliance with applicable regulatory requirements, including California Health and Safety Code (HSC) Section 7050.5 and Public Resources Code (PRC) Section 5097, would be required. Overall, impacts to cultural resources under Alternative 1 would be less than those of the proposed project due to the reduced scale of potential development.

Energy. Under Alternative 1, the subdivision of an approximately 60-acre project site into 259 lots for future development of single-family homes, 15 lots for open space and park use, and associated landscaping, roadway, and utility improvements. The project site would therefore remain undeveloped and continue to be seasonally farmed for hay by a volunteer farmer and maintained by the property owner in the near term. However, under Alternative 1, a future development proposal by either the property owner or another entity could develop the site under the existing RE zoning designation with approximately 24 single-family residential lots, each approximately 2.5 acres in size, with rural roadway access and limited on-site infrastructure. Future development under Alternative 1 would result in construction and operational activities on the project site. Construction would consume electricity, diesel fuel, and gasoline, and operation would increase electricity and natural gas demand (if natural gas is required). Energy consumption in support of or related to Alternative 1 would include transportation energy demands associated with daily residential vehicle trips to and from the project site, as well as facility energy demands associated with residential building operations, including electricity and natural gas use for heating, cooling, lighting, and appliances. Although project construction and operation would require energy use, Alternative 1 would be required to comply with applicable conservation and efficient energy use regulations, including Title 24 building energy efficiency standards. In addition, Alternative 1 would not be expected to result in the wasteful, inefficient, or unnecessary consumption of energy resources, or conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Overall, impacts to energy under Alternative 1 would be less than those of the proposed project due to the reduced scale of potential development.

Geology and Soils. Under Alternative 1, the subdivision of an approximately 60-acre project site into 259 lots for future development of single-family homes, 15 lots for open space and park use, and associated landscaping, roadway, and utility improvements. The project site would therefore remain undeveloped and continue to be seasonally farmed for hay by a volunteer farmer and maintained by the property owner in the near term. However, under Alternative 1, a future development proposal by either the property owner or another entity could develop the site under the existing RE zoning designation with approximately 24 single-family residential lots, each approximately 2.5 acres in size, with rural roadway access and limited on-site infrastructure. Future development under Alternative 1 would involve construction activities that would be similar in type and extent to the proposed

project but would be shorter in duration with reduced intensity due to development of fewer residential units. Alternative 1 would not result in any impacts associated with rupture of a known earthquake fault, seismic-related ground failure, landslides, lateral spreading, liquefaction, subsidence, or collapsible soils, as these hazards are not present at the project site. The project site is not within an Alquist-Priolo Earthquake Fault Zone; however, it is classified as Site Class D, which indicates a moderate potential for seismic ground shaking consistent with regional conditions. The project site is also underlain by clay soils with moderate to very high expansion potential, and one never productive, plugged and abandoned oil/gas well is present. It is anticipated that paleontological resources could be encountered during ground disturbance. Therefore, future development under Alternative 1 would be subject to applicable California Building Code (CBC) requirements, including provisions related to seismic design and expansive soils, as well as local grading and geotechnical standards designed to address site-specific soil conditions. Construction activities would also be required to follow standard protocols for the inadvertent discovery of paleontological resources. Overall, impacts to energy under Alternative 1 would be similar to those of the proposed project.

Greenhouse Gas Emissions. Under Alternative 1, the subdivision of an approximately 60-acre project site into 259 lots for future development of single-family homes, 15 lots for open space and park use, and associated landscaping, roadway, and utility improvements. The project site would therefore remain undeveloped and continue to be seasonally farmed for hay by a volunteer farmer and maintained by the property owner in the near term. However, under Alternative 1, a future development proposal by either the property owner or another entity could develop the site under the existing RE zoning designation with approximately 24 single-family residential lots, each approximately 2.5 acres in size, with rural roadway access and limited on-site infrastructure. Future development under Alternative 1 would result in construction and operational activities on the project site. However, due to the reduced number of residential units compared to the proposed project, this alternative would result in reduced construction and operational greenhouse gas emissions, including those due to mobile sources (e.g., cars, trucks, and buses), area sources (e.g., maintenance activities and landscaping), indirect emissions from sources associated with energy consumption, waste sources (land filling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution). However, Alternative 1 would still require consistency with the City's Climate Action and Adaptation. Overall, impacts to greenhouse gases under Alternative 1 would be less than those of the proposed project due to the reduced scale of potential development.

Hazards and Hazardous Materials. Under Alternative 1, the subdivision of an approximately 60-acre project site into 259 lots for future development of single-family homes, 15 lots for open space and park use, and associated landscaping, roadway, and utility improvements. The project site would therefore remain undeveloped and continue to be seasonally farmed for hay by a volunteer farmer and maintained by the property owner in the near term. However, under Alternative 1, a future development proposal by either the property owner or another entity could develop the site under the existing RE zoning designation with approximately 24 single-family residential lots, each approximately 2.5 acres in size, with rural roadway access and limited on-site infrastructure. Future development under Alternative 1 would result in construction and operational activities on the project site which would be similar in type and extent to the proposed project but would be shorter

in duration with reduced intensity due to development of fewer residential units. Similar to the proposed project, Alternative 1 would not result in any impacts associated with being included on a hazardous materials site pursuant to Government Code Section 65962.5, being located within an airport land use plan or within two miles of a public airport or exposing people or structures to a significant risk of loss, injury, or death involving wildland fires, as the project site is not located in an area affected by these hazards.Construction of Alternative 1, like the proposed project, would also involve the routine transport, use, and disposal of limited quantities of fuels, lubricants, and other materials typical of residential and retail development. Compliance with federal and State regulations, including Occupational Safety and Health Administration (OSHA) and California Occupational Safety and Health Administration (Cal/OSHA) standards, the U.S. Department of Transportation (USDOT) requirements, the Resource Conservation and Recovery Act (RCRA), and California Code of Regulations (CCR) Title 22, would ensure that these activities do not create a significant hazard. In addition, because construction would disturb more than one acre, Alternative 1 would be required to obtain coverage under the Construction General Permit and prepare a Storm Water Pollution Prevention Plan (SWPPP). Consistent with the proposed project, construction activities associated with Alternative 1 could temporarily affect emergency access and response times due to potential partial lane closures along Marshall Road and Otis Avenue. However, because Alternative 1 would include a reduced level of on-site infrastructure and development of approximately 24 residential units, impacts would be less than those associated with the proposed project.

Additionally, during operation of Alterative 1, hazardous materials use would be limited to small quantities of cleaning products, landscaping chemicals, and consumer goods associated with residential and retail uses. These materials would be stored, used, and disposed of in accordance with manufacturers' instructions and applicable regulations. No schools are located within 0.25 mile of the site, and therefore Alternative 1 would not emit hazardous emissions or handle acutely hazardous materials in proximity to a school similar to the proposed project.

Under Alternative 1, all roadways would be designed and constructed to adequate widths for public safety pursuant to City requirements, and structures, roadways, and facilities would be designed and constructed in accordance with California Fire Code (CFC) requirements. Therefore, implementation of Alternative 1 would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Overall, impacts to hazards and hazardous materials under Alternative 1 would be less than those of the proposed project due to the reduced intensity and scale of development.

Hydrology and Water Quality. Under Alternative 1, the subdivision of an approximately 60-acre project site into 259 lots for future development of single-family homes, 15 lots for open space and park use, and associated landscaping, roadway, and utility improvements. The project site would therefore remain undeveloped and continue to be seasonally farmed for hay by a volunteer farmer and maintained by the property owner in the near term. However, under Alternative 1, a future development proposal by either the property owner or another entity could develop the site under the existing RE zoning designation with approximately 24 single-family residential lots, each approximately 2.5 acres in size, with rural roadway access and limited on-site infrastructure. While the overall development program would be smaller compared to the proposed project, the types of

construction activities such as grading or site work would still occur. Therefore, potential impacts related to site-specific hydrology and drainage patterns, including erosion, sedimentation, and stormwater runoff, would be similar to those of the proposed project because such impacts are primarily a function of the project site's hydrological conditions. Construction activities under Alternative 1 would involve similar grading and soil disturbance as the proposed project, with the potential to result in short-term erosion or discharge of pollutants such as discharge of sediment, trash, or fuels to receiving waters. Similar to the proposed project, Alternative 1 would be required to comply with the Construction General Permit, which requires preparation and implementation of a SWPPP.

Furthermore, similar to the proposed project, operation of Alternative 1 would include stormwater runoff from streets, driveways, and rooftops which could contain urban pollutants such as nutrients, metals, pesticides, oils and grease, and trash. Like the proposed project, Alternative 1 would be required to adhere to the City's Municipal Separate Storm Sewer System (MS4) permit.

In addition, because Alternative 1 would be developed on the same site as the proposed project, it would also be located within the natural floodplain of the Sacramento River and could be subject to inundation if the levees were to fail. Similar to the proposed project, inundation of the site during a flood event could result in the release of pollutants, representing a potentially significant impact. Although Alternative 1 would be required to comply with Chapter 15.50 of the City's Municipal Code, which requires either constructing flood management improvements or other mitigation measures beyond those required under the City's Floodplain Management Ordinance (Title 18), or paying the in-lieu flood management fee established by City Council resolution, compliance with Chapter 15.50 would not eliminate the potential for pollutant release during inundation. Therefore, similar to the proposed project, which would have less-than-significant impacts on hydrology and water quality, except for flooding. Therefore, Alternative 1 would also result in a significant and unavoidable impact related to flooding.

Land Use and Planning. Alternative 1 would not require subdivision of an approximately 60-acre project site into 259 lots for future development of single-family homes, 15 lots for open space and park use, and associated landscaping, roadway, and utility improvements. In addition, Alternative 1 would not require an Amendment to the City's General Plan, an Amendment to the Southport Framework Plan to change the designation from RE to LR, or a Zoning Map/Code Amendment to rezone the site from RE to R-1-A. As such, under this alternative, the project site would remain undeveloped in the near term and would be consistent with the site's General Plan land use designation and zoning. However, under Alternative 1, a future development proposal by either the property owner or another entity could develop the site under the existing RE zoning designation with approximately 24 single-family residential lots, each approximately 2.5 acres in size, with rural roadway access and limited on-site infrastructure. Alternative 1 would not result in the physical division of an established community or cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, as the existing land use is consistent with the project site's General Plan land use designation and zoning. Overall, impacts to land use and planning under Alternative 1 would be less than those of the proposed project.

Mineral Resources. Under Alternative 1, the subdivision of an approximately 60-acre project site into 259 lots for future development of single-family homes, 15 lots for open space and park use, and associated landscaping, roadway, and utility improvements. The project site would therefore remain undeveloped and continue to be seasonally farmed for hay by a volunteer farmer and maintained by the property owner in the near term. However, under Alternative 1, a future development proposal by either the property owner or another entity could develop the site under the existing RE zoning designation with approximately 24 single-family residential lots, each approximately 2.5 acres in size, with rural roadway access and limited on-site infrastructure.

Accordingly, Alternative 1 would develop the same project site as the proposed project but at a lower residential density. Alternative 1 would not result in the loss of availability of a known mineral resource or a locally important mineral resource recovery site as there are no known mineral resources in the vicinity of the project site. Therefore, like the proposed project, Alternative 1 would result in no impacts to mineral resources.

Noise. Alternative 1 would not require subdivision of an approximately 60-acre project site into 259 lots for future development of single-family homes, 15 lots for open space and park use, and associated landscaping, roadway, and utility improvements. The project site would therefore remain undeveloped and continue to be seasonally farmed for hay by a volunteer farmer and maintained by the property owner in the near term. However, under Alternative 1, a future development proposal by either the property owner or another entity could develop the site under the existing RE zoning designation with approximately 24 single-family residential lots, each approximately 2.5 acres in size, with rural roadway access and limited on-site infrastructure.

Construction activities under Alternative 1 would be similar in type and extent to the proposed project but would occur over a shorter duration and at reduced intensity due to the development of fewer residential units. Construction activities would also generally occur at greater distances from the nearest sensitive receptors, as future development under this alternative would be more dispersed than under the proposed project. As a result, daily construction noise levels would be lower than those generated by the proposed project. In addition, Alternative 1 would include fewer residential units, operational traffic volumes and associated traffic noise would be lower than under the proposed project. Overall, Alternative 1 would result in reduced noise effects compared to the proposed project.

Population and Housing. Alternative 1 would not require subdivision of an approximately 60-acre project site into 259 lots for future development of single-family homes, 15 lots for open space and park use, and associated landscaping, roadway, and utility improvements. The project site would therefore remain undeveloped and continue to be seasonally farmed for hay by a volunteer farmer and maintained by the property owner in the near term. However, under Alternative 1, a future development proposal by either the property owner or another entity could develop the site under the existing RE zoning designation with approximately 24 single-family residential lots, each approximately 2.5 acres in size, with rural roadway access and limited on-site infrastructure. Under Alternative 1, up to 24 residential units could be built out increasing the overall population by approximately 67 residents. This would result in a direct, though not substantial, increase in population at the project site. Although Alternative 1 would have less than significant impacts on

population growth, Alternative 1's overall impact on population and housing would be less than that of the proposed project.

Public Services. Alternative 1 would not require subdivision of an approximately 60-acre project site into 259 lots for future development of single-family homes, 15 lots for open space and park use, and associated landscaping, roadway, and utility improvements. As such, the project site would remain undeveloped consistent with existing conditions in the near term. However, under Alternative 1, a future development proposal by either the property owner or another entity could develop the site under the existing RE zoning designation with approximately 24 single-family residential lots, each approximately 2.5 acres in size, with rural roadway access and limited on-site infrastructure. Under Alternative 1, up to 24 residential units could be built out increasing the overall population by approximately 67 residents. Because Alternative 1 would result in only 67 residents compared to the 725 residences proposed under the proposed project, there would be a reduced demand for fire protection, police services, schools, parks, libraries, and other public facilities. Like the proposed project, required development fees and other measures would offset any potential impacts to fire protection, police services, school facilities, parks, libraries, and other public facilities. Therefore, Alternative 1 would result in less than significant impacts to public services; however, due to the lower residential density, the level of impact would be less than for the proposed project.

Recreation. Under Alternative 1, the project site would remain undeveloped and consistent with existing conditions in the near term. However, under Alternative 1, a future development proposal by either the property owner or another entity could develop the site under the existing RE zoning designation with approximately 24 single-family residential lots, each approximately 2.5 acres in size, with rural roadway access and limited on-site infrastructure. Alternative 1 would therefore result in fewer residential units when compared to the proposed project. As a result, demand for recreational facilities and open space would increase over existing conditions but would result in less demand when compared to the proposed project. Therefore, Alternative 1 would result in less than significant impacts to public services; however, due to the lower residential density, the level of impact would be less than for the proposed project.

Transportation. Alternative 1 would not require subdivision of an approximately 60-acre project site into 259 lots for future development of single-family homes, 15 lots for open space and park use, and associated landscaping, roadway, and utility improvements. Accordingly, the project site would remain undeveloped consistent with existing conditions in the near term. However, under Alternative 1, a future development proposal by either the property owner or another entity could develop the site under the existing RE zoning designation with approximately 24 single-family residential lots, each approximately 2.5 acres in size, with rural roadway access and limited on-site infrastructure. Under Alternative 1, the project site would be developed at a lower residential density compared to the proposed project. As Alternative 1 would result in fewer residential units than the proposed project, it would generate a lower number of vehicle trips to and from the project site. This reduced trip generation would reduce traffic volumes on the surrounding roadway network relative to the proposed project and would generally be expected to result in improved intersection operations compared to the proposed project. However, similar to the proposed project, Alternative 1 would be located in a high VMT area where residential VMT per capita is higher than the regional average of 85percent, would not be located in a transit priority area, and would not be an affordable

housing project. Therefore, Alternative 1 would not screen out of a detailed VMT analysis per applicable criteria included in the Governor's Office of Land Use and Climate Innovation (LCI) Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory) and a less than significant VMT impact cannot be assumed for Alternative 1. While Alternative 1 would likely result in reduced operational impacts compared to the proposed project, without quantification of VMT or alternative-specific VMT analysis, it cannot be determined if the reduction in proposed development and vehicle trips to and from the project site would reduce VMT impacts below applicable significance thresholds. Therefore, impacts under Alternative 1 would be significant and unavoidable, similar to the proposed project.

Tribal Cultural Resources. Under Alternative 1, the project site would remain undeveloped and consistent with existing conditions in the near term. However, under Alternative 1, a future development proposal by either the property owner or another entity could develop the site under the existing RE zoning designation with approximately 24 single-family residential lots, each approximately 2.5 acres in size, with rural roadway access and limited on-site infrastructure. Alternative 1 would therefore result in fewer residential units compared to the proposed project. In addition, Alternative 1 would not require the undergrounding or construction of new utilities or new or expanded entitlements. However, future development under Alternative 1 would involve ground-disturbing activities such as grading, excavation, and utility installation that could result in impacts to previously undiscovered tribal cultural resources. While the overall development program would be smaller compared to the proposed project, the types of ground-disturbing activities would be generally similar in nature but reduced in overall scale and intensity. Similar to the proposed project, Alternative 1 would have the potential to impact previously undiscovered tribal cultural resources because it would require ground-disturbing activities. As such, Alternative 1 would be subject to applicable tribal cultural resource protection requirements, including standard inadvertent discovery procedures, as applicable, to reduce potential impacts to a less than significant level. Overall, impacts to tribal cultural resources under Alternative 1 would be less than those of the proposed project due to the reduced scale of potential development.

Utilities and Service Systems. Under Alternative 1, the project site would remain undeveloped and consistent with existing conditions in the near term. However, under Alternative 1, a future development proposal by either the property owner or another entity could develop the site under the existing RE zoning designation with approximately 24 single-family residential lots, each approximately 2.5 acres in size, with rural roadway access and limited on-site infrastructure. Alternative 1 would therefore result in fewer residential units compared to the proposed project. In addition, Alternative 1 would not require the undergrounding or construction of new utilities or new or expanded entitlements. Because this alternative would include substantially fewer residential units than the proposed project, demand for water supply, wastewater, stormwater, electricity, and telecommunications services would be less than under the proposed project. Therefore, Alternative 1 would result in less than significant impacts to utilities and service systems; however, due to the lower residential density, the level of impact would be less than for the proposed project.

Wildfire. Under Alternative 1, the project site would remain undeveloped and consistent with existing conditions in the near term. However, under Alternative 1, a future development proposal by either the property owner or another entity could develop the site under the existing RE zoning

designation with approximately 24 single-family residential lots, each approximately 2.5 acres in size, with rural roadway access and limited on-site infrastructure. Alternative 1 would therefore result in fewer residential units and less landscaping and infrastructure when compared to the proposed project. Alternative 1, like the proposed project, is not located within a very high fire hazard severity zone, landslide hazard zone, or an area at risk of wildfire. Therefore, Alternative 1 would not exacerbate wildfire risks or expose people or structures to significant risks, including downslope or landslides, as a result of runoff post-fire slope instability, or drainage changes. In addition, like the proposed project, Alternative 1 would also be located on the same site and would not expose occupants or structures to significant risks associated with downslope or downstream flooding, post-fire slope instability, or drainage changes.

In addition, like the proposed project Alternative 1 would not physically impair or otherwise interfere with emergency response or evacuation in the project vicinity. Additionally, all structures and internal circulation paths associated with Alternative 1 would be developed in accordance with the City and West Sacramento Fire Department (WSFD) emergency access standards. Therefore, Alternative 1 would not impair an adopted emergency response or emergency evacuation plan. As such, Alternative 1 would result in less than significant impacts to wildfire; however, due to the lower residential density, the level of impact would be less than for the proposed project.

5.4.1.2 Overview of Potential Impacts/Comparison to Proposed Project

As stated above, under Alternative 1, the project site would remain undeveloped and consistent with existing conditions in the near term. However, under Alternative 1, a future development proposal by either the property owner or another entity could develop the site under the existing RE zoning designation with approximately 24 single-family residential lots, each approximately 2.5 acres in size, with rural roadway access and limited on-site infrastructure. Compared to the proposed project, Alternative 1 would generally result in reduced impacts given the reduced development footprint and reduced density. However, it would still result in a significant and unavoidable transportation impact related to VMT.

5.4.1.3 Project Objectives

Because the No Project Alternative represents foreseeable buildout under existing conditions, none of the eight project objectives would be fully achieved. Although approximately 24 residential units could potentially be developed under existing RE zoning, this foreseeable buildout would not include the associated landscaping, roadway, and utility improvements contemplated under the proposed project, nor would it enhance connectivity or bicycle and pedestrian facilities. The No Project Alternative would also not provide a sufficient number of new housing units to assist the City in satisfying its RHNA goals or provide. Therefore, the No Project Alternative would not meet any of the eight project objectives.

5.4.2 Alternative 2: Reduced Density / Rural Buffer

5.4.2.1 Description

Similar to the proposed project, Alternative 2 would be located on the same approximately 60-acre project site and would include the same landscaping, roadway, and utility improvements as the proposed project. The proposed 15 open space lots totaling approximately 6.65 acres, including the

0.68-acre Central Park, 0.14-acre parklet, 1.81 acres of landscaped lots, and 4.02-acre detention basin, would also be retained under Alternative 2, as well as the proposed frontage improvements along Marshall Road and Otis Avenue.

However, Alternative 2 would require an Amendment to the City's General Plan and an Amendment to the Southport Framework Plan to redesignate the project site from RE to RR for the lots bordering existing development to the south and west (buffer lots), and LR for the remainder of the project site. Subsequently, the buffer lots would require a Zoning Map/Code Amendment to rezone from RE to RRA, while the remainder of the project site would also require a Zoning Map/Code Amendment be rezoned R-1-B.

Per the City's zoning code, the RRA zoning district is intended for rural residential development with limited agricultural uses and limited on-site water and sewer systems. This zoning district generally provides for between 0.5 and 1.0 dwelling unit per acre, with a minimum lot size of one acre. The R-1-B zoning district provides for single-unit dwellings and compatible public and quasi-public uses while maintaining the character of existing single-family neighborhoods. Minimum lot sizes in this zoning district would be 6,000 square feet, compared to 5,000 square feet in the R-1-A zoning district, and residential densities would range from 1.1 to 6.0 dwelling units per gross acre. When compared to the proposed project, Alternative 2 would see a reduction in allowable residential density of approximately 20 percent due to larger lot sizes. Accordingly, Alternative 2 would result in the construction of 207 residential units, compared to 259 residential units under the proposed project, a reduction of 52 residential units.

The potential impacts associated with Alternative 2 are described below. All regulatory compliance and mitigation measures prescribed for the proposed project would also be applicable to Alternative 2.

5.4.2.2 Environmental Analysis

Aesthetics. Similar to the proposed project, Alternative 2 would be developed on the same approximately 60-acre project site. However, Alternative 2 would include land use and zoning changes that would reduce the overall allowable residential density on the project site, resulting in development of 20 percent fewer residential units. Alternative 2 would redesignate the project site from RE to RR for the buffer lots, and LR for the remainder of the project site. Subsequently, the buffer lots would be rezoned from RE to RRA and the remainder of the project site would be rezoned R-1-B. Rezoning the buffer lots to RE would provide an area of less intense development between the center of the project site and the surrounding neighborhoods. The remaining lots would be rezoned R1-B with a minimum lot size of 6,000 square feet, slightly larger than the 5,000-square-foot minimum lots rezoned R-1-A under the proposed project.

Similar to the proposed project, development of Alternative 2 would alter the existing visual condition of the project site through the introduction of development on currently vacant land. Alternative 2 would comply with the City's General Plan goals and policies regarding aesthetics. The design guidelines and landscaping plan would ensure the project site is developed to be consistent with the visual characteristics of the surrounding areas. Architectural design and landscaping would be the same as the proposed project. It is expected that, lower density aside, the overall visual

appearance under this alternative would be similar to the proposed project and would not have a significant impact. As with the proposed project, construction of the proposed project would comply with the City's lighting standards and requirements, as detailed in Section 17.22.080, Lighting and Illumination, of the City's Municipal Code. Construction activities would also be limited to daytime hours. Development of Alternative 2 would occur in the same location, pattern, and extent as that of the proposed project. Therefore, it is reasonable to conclude that impacts related to the aesthetic condition and to visual resources would be less than significant and no mitigation measures are required. The level of impact associated with this issue would remain the same under Alternative 2 as for the proposed project.

Agricultural Resources. Alternative 2 would develop the same project site as the proposed project; therefore, impacts to agricultural and forestry resources would be similar to those resulting from the proposed project. Accordingly, impacts to agriculture and forestry resources would be less than significant under this alternative. The level of impact would remain the same under Alternative 2 as for the proposed project.

Air Quality. Alternative 2 would develop the same project site as the proposed project but at a lower residential density. Alternative 2 would include the same open space lots and roadway, landscaping, and utility improvements as the proposed project. Construction activities under Alternative 2 would be similar in type and extent to the proposed project but would be shorter in duration with reduced intensity due to development of fewer residential units. However, due to the reduced number of residential units proposed under this alternative, this alternative may result in reduced construction and operational emissions, including those due to vehicle trips, compared to those under the proposed project. However, similar to the proposed project, construction of the proposed project would still require implementation of **Regulatory Compliance Measure AIR-1,** which requires incorporation of fugitive dust measures consistent with YSAQMD's Rule 2.11 and **Mitigation Measure AIR-1**, which requires all off-road diesel-powered construction equipment of 25 horsepower or more used during construction of the proposed project shall be equipped with Tier 3 engines or higher, as certified by the California Air Resources Board. Overall, under Alternative 2, construction and operational air quality impacts would be less than the proposed project due to the reduced development. Nevertheless, implementation Alternative 2 would result in less than significant impacts to air quality with implementation of **Regulatory Compliance Measure AIR-1** and **Mitigation Measures AIR-1** and compliance with applicable regulatory requirements, similar to the proposed project.

Biological Resources. Alternative 2 would develop the same project site as the proposed project but at a lower residential density. Alternative 2 would include the same open space lots and roadway, landscaping, and utility improvements as the proposed project. Construction activities under Alternative 2 would be similar in type and extent to the proposed project but would be shorter in duration with reduced intensity due to development of fewer residential units.

Similar to the proposed project, Alternative 2 would involve disturbance of the approximately 60-acre project site, resulting in the conversion of ruderal grassland to developed land uses and the

permanent loss of approximately 58.34 acres of potential foraging habitat for special-status wildlife.[1] Accordingly, like the proposed project, development of Alternative 2 could adversely affect special-status wildlife species as a result of project-related activities and would also be required to implement **Mitigation Measures BIO-1** through **BIO-4**, which require preconstruction nesting surveys, establishment of appropriate no-disturbance buffers around active nests, coordination with California Department of Fish and Wildlife (CDFW) as needed, and biological monitoring during construction if work occurs within buffer areas consistent with Yolo HCP/NCCP *AMM16*, *Minimize Take and Adverse Effects on Swainson's Hawk and White-Tailed Kite*) to reduce potential impacts to Swainson's hawk, white-tailed kite, and other nesting birds to a less than significant level. Similar to the proposed project, Alternative 2 would be subject to the provisions of the City's Tree Preservation Ordinance **(Regulatory Compliance Measure BIO-1)**, the requirements of the Yolo HCP/NCCP application and fee requirements (**Regulatory Compliance Measure BIO-2)**, the Migratory Bird Treaty Act, and California Fish and Game Code. Because Alternative 2 would be located on the same project site, it would also be subject to the Yolo HCP/NCCP and would be required to implement Mitigation **Measures BIO-5** through **BIO-8**, which require worker training, confining and delineating work areas, controlling nighttime lighting, and minimizing impacts from staging and temporary work areas. It is assumed that, similar to the proposed project, Alternative 2 would also involve the removal of two trees on the project site and would be required to implement **Regulatory Compliance Measure BIO-5**, which requires issuance of a tree permit from the City's Tree Administrator. However, similar to the proposed project, Alternative 2 would not result in adverse effects on any riparian habitat or other sensitive natural community or result in adverse effects on state or federally protected wetlands as none of these resources are present at the project site. Therefore, consistent with the proposed project, Alternative 2 would result in less than significant impacts to biological resources with implementation of **Mitigation Measures BIO-1** through **BIO-8** and compliance with applicable regulatory requirements.

Cultural Resources. Alternative 2 would develop the same project site as the proposed project but at a lower residential density. Alternative 2 would include the same open space lots and roadway, landscaping, and utility improvements as the proposed project. Construction activities under Alternative 2 would be similar in type and extent to the proposed project but would be shorter in duration with reduced intensity due to development of fewer residential units. Alternative 2 would not cause a substantial adverse change in the significance of a historical resource as there are no "historical resources" on the project site. Alternative 2 would have the potential to impact previously undiscovered archaeological resources and human remains because it would require ground-disturbing activities. Similar to the proposed project, Alternative 2 would be required to implement **Regulatory Compliance Measure CUL-1**, which requires that any identified remains be treated in accordance with Section 7050.5 of the Health and Safety Code (HSC) and Public Resources Code (PRC) Section 5097. Alternative 2 would also be required to implement **Mitigation Measures CUL-1, TCR-1** and **TCR-2** which require the protection of known and unknown archaeological resources; Worker Environmental Awareness Program (WEAP) training prior to ground-disturbing activities; and archaeological monitoring during all ground-disturbing activities. Therefore, consistent with the

[1] The combined area of the five parcels that make up the project site totals an actual 58.34 acres, but is rounded up by the tax assessor to 60 acres. Accordingly, the project site is described as 60 acres while the BSA reflects the actual project site acreage of the combined five parcels

proposed project, Alternative 2 would result in less than significant impacts to cultural resources with implementation of mitigation measures.

Energy. Alternative 2 would develop the same project site as the proposed project but at a lower residential density. Alternative 2 would include the same open space lots and roadway, landscaping, and utility improvements as the proposed project. Construction activities under Alternative 2 would be similar in type and extent to the proposed project but would be shorter in duration with reduced intensity due to development of fewer residential units. In addition, compared to the proposed project, this alternative would also result in reduced operational energy use as a result of fewer mobile sources (e.g., cars, trucks, and buses). As a result, this project would result in less energy consumption and fewer impacts when compared to the proposed project. Overall, under Alternative 2, construction and operational energy impacts would be less than the proposed project due to the reduced development. Nevertheless, implementation Alternative 2 would result in less than significant impacts to energy, similar to the proposed project.

Geology and Soils. Alternative 2 would develop the same project site as the proposed project but at a lower residential density. Alternative 2 would include the same open space lots and roadway, landscaping, and utility improvements as the proposed project. Construction activities under Alternative 2 would be similar in type and extent to the proposed project but would be shorter in duration with reduced intensity due to development of fewer residential units.

Alternative 2 would not result in any impacts associated with rupture of a known earthquake fault, seismic-related ground failure, landslides, lateral spreading, liquefaction, subsidence, or collapsible soils, as these hazards are not present at the project site. The project site is not within an Alquist-Priolo Earthquake Fault Zone; however, it is classified as Site Class D, which indicates a moderate potential for seismic ground shaking consistent with regional conditions. The project site is also underlain by clay soils with moderate to very high expansion potential, and one never productive, plugged and abandoned oil/gas well is present. It is anticipated that paleontological resources could be encountered during ground disturbance. Therefore, **Mitigation Measures GEO-1** through **GEO-3**, which require implementation of geotechnical design recommendations, treatment of expansive soils, and implementation of paleontological resource procedures, would remain applicable under Alternative 2, as for the proposed project. Therefore, like the proposed project, Alternative 2 would result in less than significant impacts to geology and soils with implementation of **Mitigation Measures GEO-1** through **GEO-3**.

Greenhouse Gas Emissions. Similar to the proposed project, Alternative 2 would involve construction and operational activities on the project site. However, due to the reduced number of residential units proposed under this alternative, this alternative would result in reduced construction and operational greenhouse gas emissions, including those due to mobile sources (e.g., cars, trucks, and buses), area sources (e.g., maintenance activities and landscaping), indirect emissions from sources associated with energy consumption, waste sources (land filling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution). However, Alternative 2 would still require consistency with the City's Climate Action and Adaptation. Overall, under Alternative 2, construction and operational GHG impacts would be less than the proposed project due to the reduced development. Nevertheless, implementation Alternative 2 would result in less than significant impacts to GHG, similar to the proposed project.

Hazards and Hazardous Materials. Alternative 2 would develop the same project site as the proposed project but at a lower residential density. Alternative 2 would include the same open space lots and roadway, landscaping, and utility improvements as the proposed project. Construction activities under Alternative 2 would be similar in type and extent to the proposed project but would be shorter in duration with reduced intensity due to development of fewer residential units. Because Alternative 2 would occur on the same site as the proposed project, it would be subject to the same environmental conditions identified in the Phase I Environmental Site Assessment (ESA), including the potential for residual agricultural chemicals in soils. Consistent with the proposed project, **Mitigation Measure HAZ-1,** which requires implementation of the Phase I ESA recommendations and **Mitigation Measure HAZ-2**, which requires coordination with the California Department of Conservation's California Geologic Energy Management Division (CalGEM), would remain applicable under Alternative 2 to reduce the potential of encountering hazardous materials during construction.

Similar to the proposed project, Alternative 2 would not result in any impacts associated with being included on a hazardous materials site pursuant to Government Code Section 65962.5, being located within an airport land use plan or within two miles of a public airport or exposing people or structures to a significant risk of loss, injury, or death involving wildland fires, as the project site is not located in an area affected by these hazards.

Construction of Alternative 2, like the proposed project, would involve the routine transport, use, and disposal of limited quantities of fuels, lubricants, and other materials typical of residential and retail development. Compliance with federal and State regulations, including Occupational Safety and Health Administration (OSHA) and California Occupational Safety and Health Administration (Cal/OSHA) standards, the U.S. Department of Transportation (USDOT) requirements, the Resource Conservation and Recovery Act (RCRA), and California Code of Regulations (CCR) Title 22, would ensure that these activities do not create a significant hazard. In addition, because construction would disturb more than one acre, Alternative 2 would be required to obtain coverage under the Construction General Permit and prepare a Storm Water Pollution Prevention Plan (SWPPP) pursuant to **Regulatory Compliance Measure WQ-1**. In addition, if Alternative 2 requires groundwater dewatering during construction, **Regulatory Compliance Measure WQ-2** which requires compliance with the Central Valley Regional Water Quality Control Board's (RWQCB) Groundwater Discharge Permit, would also be applicable.

Consistent with the proposed project, construction activities associated with Alternative 2 may affect emergency access and response times, due to potential partial lane closures along Marshall Road and Otis Aveune. However, internal access roads would be constructed to code, allowing emergency response vehicles with access to the residential development. As such, in order to maintain traffic flows to the greatest extent practicable during construction, the construction contractor would be required to prepare and implement a Transportation Management Plan (TMP) (Regulatory Compliance Measure TRA-1), to maintain traffic flow along Marshall Road and Otis Avenue, safe access into and out of the project site, and emergency access to the project site and adjacent areas during construction.

Additionally, during operation of Alterative 2, hazardous materials use would be limited to small quantities of cleaning products, landscaping chemicals, and consumer goods associated with residential and retail uses. These materials would be stored, used, and disposed of in accordance with manufacturers' instructions and applicable regulations. No schools are located within 0.25 mile of the site, and therefore Alternative 2 would not emit hazardous emissions or handle acutely hazardous materials in proximity to a school similar to the proposed project.

Under Alternative 2, all roadways would be designed and constructed to adequate widths for public safety pursuant to City requirements, and structures, roadways, and facilities would be designed and constructed in accordance with California Fire Code (CFC) requirements. Therefore, implementation of Alternative 2 would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Consistent with the proposed project, Alternative 2 would result in less than significant impacts related to hazards and hazardous materials with implementation of **Mitigation Measures HAZ-1** and **HAZ-2** and compliance with **Regulatory Compliance Measures WQ-1, WQ-2, and TRA-1**.

Hydrology and Water Quality. Alternative 2 would be developed within the same overall grading footprint as the proposed project. As such, potential impacts related to site-specific hydrology and drainage patterns, including erosion, sedimentation, and stormwater runoff, would be similar to those of the proposed project because such impacts are primarily a function of the project site's hydrological conditions. Construction activities under Alternative 2 would involve similar grading and soil disturbance as the proposed project, with the potential to result in short-term erosion or discharge of pollutants such as discharge of sediment, trash, or fuels to receiving waters. Similar to the proposed project, Alternative 2 would be required to comply with the Construction General Permit (**Regulatory Compliance Measure WQ-1**), which requires preparation and implementation of a SWPPP. If groundwater is encountered during excavation, dewatering activities under Alternative 2 would also be subject to testing and treatment requirements prior to discharge consistent with **Regulatory Compliance Measure WQ-2.**

Furthermore, similar to the proposed project, operation of Alternative 2 would include stormwater runoff from streets, driveways, and rooftops which could contain urban pollutants such as nutrients, metals, pesticides, oils and grease, and trash. Like the proposed project, Alternative 2 would be required to implement **Regulatory Compliance Measure WQ-3**, which requires the preparation of a Final Post-Construction Standard Plan Worksheet in compliance with the City's Phase II Municipal Separate Storm Sewer System (MS4) permit and the implementation of site design, source control,

runoff reduction, storm water treatment, and LID BMPs to minimize stormwater runoff. Because Alternative 2 would be developed on the same site as the proposed project, it would be subject to the same flood hazard conditions as the proposed project.

In addition, because Alternative 2 would be developed on the same site as the proposed project, it would also be located within the natural floodplain of the Sacramento River and could be subject to inundation if the levees were to fail. Similar to the proposed project, inundation of the site during a flood event could result in the release of pollutants, representing a potentially significant impact. Although Alternative 2 would be required to comply with Chapter 15.50 of the City's Municipal Code (**Regulatory Compliance Measure WQ-4)**, which requires either constructing flood management improvements or other mitigation measures beyond those required under the City's Floodplain Management Ordinance (Title 18), or paying the in-lieu flood management fee established by City Council resolution, compliance with Chapter 15.50 would not eliminate the potential for pollutant release during inundation. Therefore, similar to the proposed project, which would have less-than-significant impacts on hydrology and water quality with implementation of regulatory compliance and mitigation measures, except for flooding, Alternative 2 would also result in a significant and unavoidable impact related to flooding.

Land Use and Planning. Alternative 2 would develop the same project site as the proposed project but at a lower residential density. Alternative 2 would include the same open space lots and roadway, landscaping, and utility improvements as the proposed project. Similar to the proposed project, Alternative 2, would not result in the physical division of an established community because the changes in land use would be confined to the project site. Alternative 2 would require an Amendment to the City's General Plan and an Amendment to the Southport Framework Plan to redesignate the project site from RE to RR for the lots bordering existing development to the south and west (buffer lots), and LR for the remainder of the project site. Subsequently, the buffer lots would require a Zoning Map/Code Amendment to rezone the remainder of the project site from RE to R-1-B. Similar to the proposed project, Alternative 2 would also be generally consistent with the land use and planning-related policies outlined in the General Plan, and no adverse physical environmental effects would result from any policy inconsistencies. Therefore, similar to the proposed project, impacts to land use and planning would be less than significant.

Mineral Resources. Alternative 2 would develop the same project site as the proposed project but at a lower residential density. Alternative 2 would include the same open space lots and roadway, landscaping, and utility improvements as the proposed project. Similar to the proposed project, Alternative 2 would not result in the loss of availability of a known mineral resource or a locally important mineral resource recovery site as there are no known mineral resources in the vicinity of the project site. Therefore, like the proposed project, Alternative 2 would result in no impacts to mineral resources.

Noise. Alternative 2 would develop the same project site as the proposed project but at a lower residential density. Construction activities under Alternative 2 would be similar in type and extent to the proposed project but would occur over a shorter duration and at reduced intensity due to the development of fewer residential units. Construction activities would generally occur at the same distances from the nearest sensitive receptors as under the proposed project. As a result, daily construction noise levels would be comparable to those generated by the proposed project;

however, the overall duration of construction noise exposure would be reduced. Similar to the proposed project, Alternative 2 would be required to implement **Mitigation Measure NOI-1**, which limits construction activities to daytime hours between 8:00 a.m. and 5:00 p.m. on weekdays. In addition, because Alternative 2 would include fewer residential units, operational traffic volumes and associated traffic noise would be lower than under the proposed project. Therefore, similar to the proposed project, Alternative 2 would result in less than significant impacts related to noise, with implementation of **Mitigation Measure NOI-1.**

Population and Housing. Alternative 2 would develop the project site at a lower residential density than the proposed project, producing fewer residents and contributing lower population growth to the City. Under the proposed project, the proposed development would include 259 single-family homes and would increase the overall population by approximately 725 residents. In comparison, Alternative 2 would include approximately 207 residential units with approximately 580 residents. This would result in a direct, though not substantial, increase in population at the project site. Overall, under Alternative 2, impacts related to population and housing would be less than the proposed project due to the reduced development. Nevertheless, implementation Alternative 2 would result in less than significant impacts to population and housing, similar to the proposed project.

Public Services. Similar to the proposed project, Alternative 2 would be developed on the same approximately 60-acre project site. However, Alternative 2 would include land use and zoning changes that would reduce the overall allowable residential density on the project site, resulting in development of 20 percent fewer residential units. Because fewer units would be constructed, there would be a slight reduction in demand for fire protection, police services, schools, parks, libraries, and other public facilities than under the proposed project. Like the proposed project, required development fees and other measures, including **Regulatory Compliance Measures PS-1** through **PS-5**, would offset any potential impacts to fire protection, police services, school facilities, parks, libraries, and other public facilities. Therefore, Alternative 2 would not substantially increase the use of existing public services or require new or expanded facilities that could result in significant environmental impacts. Therefore, Alternative 2 would result in less than significant impacts to public services; however, due to the lower residential density, the level of impact would be less than for the proposed project.

Recreation. Under Alternative 2, the project site would be developed with approximately 207 single-family residential units, compared to 259 units under the proposed project. Alternative 2 is anticipated to generate approximately 580 new residents, compared to 725 under the proposed project, and would therefore generate less demand on parks and recreational facilities. Similar to the proposed project, Alternative 2 would include approximately 6.65 acres of open space consisting of the Central Park, parklet, landscape lots, and the detention basin. Additionally, landscaping would be installed throughout the residential areas and open space lots. Alternative 2 would also require the payment of park fees as specified in **Regulatory Compliance Measure PS-4**. Implementation of **Regulatory Compliance Measure PS-4** would ensure that Alternative 2 would not cause or accelerate substantial physical deterioration of existing recreational facilities. Therefore, like the proposed project, which would have less than significant recreation impacts, Alternative 2 would

have less than significant recreation impacts, and this alternative would result in slightly lower impacts than the proposed project.

Transportation. Alternative 2 would develop the same project site as the proposed project but at a lower residential density. Alternative 2 would include the same open space lots and roadway, landscaping, and utility improvements as the proposed project. Similar to the proposed project, Alternative 3 would not conflict with any of the goals and policies contained in the City's General Plan related to the circulation system. However, given that Alternative 2 would likely generate less trips to and from the project site, this impact may be slightly reduced.

As Alternative 3 would result in fewer residential units compared to the proposed project, this Alternative would generate fewer vehicle trips to and from the project site and a reduction in VMT during operation. However, without quantification of VMT or alternative-specific VMT analysis, it cannot be determined if the reduction in proposed development and vehicle trips to and from the project site would reduce VMT impacts to below applicable significance thresholds. Therefore, without quantification of VMT or alternative-specific VMT analysis, VMT impacts under Alternative 2 would be significant and unavoidable, similar to the proposed project.

Consistent with the proposed project, construction activities associated with Alternative 2 may affect emergency access and response times, due to potential partial lane closures along Marshall Road and Otis Aveune. However, internal access roads would be constructed to code, allowing emergency response vehicles with access to the residential development. As such, in order to maintain traffic flows to the greatest extent practicable during construction, the construction contractor would be required to prepare and implement a TMP (**Regulatory Compliance Measure TRA-1**), to maintain traffic flow along Marshall Road and Otis Aveune, safe access into and out of the project site, and emergency access to the project site and adjacent areas during construction. Overall, implementation of Alternative 2 would have a significant and unavoidable transportation impact related to VMT, similar to the proposed project.

Tribal Cultural Resources. Alternative 2 would be developed similar to the proposed project on the same approximately 60-acre site. However, Alternative 2 would reduce the overall density of the proposed project by reducing the number of residential units. Similar to the proposed project, Alternative 2 would include the same roadway, landscaping, utility, and frontage improvements, as well as the same open space configuration. Construction activities under Alternative 2 would be similar in type and extent to the proposed project but would occur over a slightly shorter duration and with reduced intensity due to fewer residential units. Similar to the proposed project, Alternative 2 would have the potential to impact previously undiscovered tribal cultural resources because it would require ground-disturbing activities. As such, **Mitigation Measures TCR-1** through **TCR-3, Mitigation Measure CUL-1,** and **Regulatory Compliance Measure CUL-1**, would also be required for Alternative 2 to reduce potential impacts to a less than significant level. Therefore, consistent with the proposed project, Alternative 2 would result in less than significant impacts to tribal cultural resources with implementation of mitigation measures.

Utilities and Service Systems. Alternative 2 would be developed similar to the proposed project on the same approximately 60-acre site. However, Alternative 2 would reduce the overall density of the proposed project by reducing the number of residential units. Similar to the proposed project,

Alternative 2 would include the same roadway, landscaping, and utility improvements, as well as the same open space configuration. However, Alternative 2 would reduce overall residential density by approximately 20 percent, resulting in the construction of 207 residential units compared to 259 units under the proposed project.

Similar to the proposed project, significant environmental effects would not occur due to the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities under Alternative 2. However, like the proposed project Alternative 2 would still be required to implement **Regulatory Compliance Measures WQ-3**,which requires the preparation of a Final Post-Construction Standard Plan Worksheet in compliance with the City's Phase II MS4 permit and the implementation of site design, source control, runoff reduction, storm water treatment, and LID BMPs to minimize stormwater runoff. Water demand, wastewater generation, and solid waste generation associated with Alternative 2 would be reduced compared to the proposed project because of the reduction in residential density and development of fewer residential units on the site. Consistent with the proposed project, sufficient water supplies are available to serve the project, the wastewater treatment provider has adequate capacity to serve the project's projected demand, and the project would not generate solid waste in excess of local standards or in excess of the capacity of local infrastructure. Additionally, Alternative 2 would comply with federal, State, and local statutes and regulations related to solid waste, including agency permits, Assembly Bill (AB) 341, Senate Bill (SB) 1016, and the California Green Building Standards Code (CALGreen Code). Therefore, although Alternative 2 would result in reduced water demand, wastewater generation, and solid waste compared to the proposed project, consistent with the proposed project, Alternative 2 would result in less than significant impacts to utilities and service systems.

Wildfire. Alternative 2 would be developed similar to the proposed project on the same approximately 60-acre site. However, Alternative 2 would reduce the overall density of the proposed project by reducing the number of residential units to 207 single-family residential units. Similar to the proposed project, Alternative 2 would include the same roadway, landscaping, and utility improvements, as well as the same open space configuration. Alternative 2, like the proposed project, is not located within a very high fire hazard severity zone, landslide hazard zone, or an area at risk of wildfire. Therefore, Alternative 2 would not exacerbate wildfire risks or expose people or structures to significant risks, including downslope or landslides, as a result of runoff post-fire slope instability, or drainage changes. In addition, like the proposed project, Alternative 2 would also be located on the same site and would not expose occupants or structures to significant risks associated with downslope or downstream flooding, post-fire slope instability, or drainage changes.

In addition, like the proposed project Alternatives 2 would not physically impair or otherwise interfere with emergency response or evacuation in the project vicinity. Additionally, all structures and internal circulation paths associated with Alternative 2 would be developed in accordance with the City and WSFD emergency access standards. Therefore, Alternative 2 would not impair an adopted emergency response or emergency evacuation plan. Installation of all project-related utility improvements under Alternative 2 would be implemented in an urbanized setting in accordance with the current California Building Code, California Fire Code, and applicable local ordinances, and impacts related to the installation or maintenance of infrastructure that may exacerbate fire risk or

result in temporary or ongoing impacts to the environment would be less than significant. Therefore, consistent with the proposed project, Alternative 2 would result in less than significant impacts with mitigation incorporated related to wildfire.

5.4.2.3 Overview of Potential Impacts/Comparison to Proposed Project

As stated above, Alternative 2 would be located on the same approximately 60-acre site and would include similar landscaping, roadway, and utility improvements as the proposed project. The proposed 15 open space lots totaling approximately 6.65 acres, including the 0.68-acre Central Park, 0.14-acre parklet, 1.81 acres of landscaped lots, and 4.02-acre detention basin, would also be retained under this alternative. The proposed frontage improvements along Marshall Road and Otis Avenue would also be constructed under this alternative. However, under Alternative 2, the proposed lots adjacent to the existing residential development to the south and west would be designated RRA. The RRA zoning district is intended for rural residential development with limited agricultural uses and limited on-site water and sewer systems. This designation generally provides for between 0.5 and 1 dwelling unit per acre, with a minimum lot size of one acre. The remaining portions of the project site would be designated R-1-B. The R-1-B district provides for single-unit dwellings and compatible public and quasi-public uses while maintaining the character of existing single-family neighborhoods. Under the R-1-B standards, minimum lot sizes would be 6,000 square feet, compared to the 5,000-square-foot minimum under the proposed R-1-A zoning, and residential densities would range from 1.1 to 6.0 dwelling units per gross acre, consistent with the City's LR General Plan land use designation. Additionally, similar to the proposed project, Alternative 2 would require an Amendment to the City's General Plan and an Amendment to the Southport Framework Plan to change the current RE designation to LR for the portion of the site proposed for R-1-B development and to RRA for the buffer area. A Zoning Map/Code Amendment would also be required to rezone the site from RE to a combination of RRA and R-1-B districts. In addition, under this alternative, it is assumed that total number of residential units would be reduced by approximately 20 percent, resulting in an estimated 207 lots, compared to 259 lots under the proposed project. Consistent with the proposed project, Alternative 2 would result in a significant and unavoidable transportation impact related to VMT.

5.4.2.4 Project Objectives

Alternative 2 would generally meet all of the project objectives because it would retain the same overall design as the proposed project, including residential development, open space areas, recreational amenities, roadway improvements, and utility infrastructure. However, objectives 7 and 8 would not be achieved to the same degree as under the proposed project because Alternative 2 would reduce residential density and total dwelling units through implementation of the RR/RRA and R-1-B land use and zoning designations. As a result, Alternative 2 would reduce the total number of residential units from 259 units to 207 units, which would provide fewer housing opportunities to assist the City in meeting its Regional Housing Needs Allocation (RHNA) goals and would generate less development-related revenue to support public facility improvements compared to the proposed project. Therefore, Alternative 2 would generally meet all project objectives; however, objectives 7 and 8 would not be met to the same degree as the proposed project.

5.4.3 Alternative 3: Mixed Use Alternative

5.4.3.1 Description

The potential impacts associated with Alternative 3 are described below. All regulatory compliance and mitigation measures prescribed for the proposed project would also be applicable to Alternative 3.

5.4.3.2 Environmental Analysis

Aesthetics. Under Alternative 3, the project would be developed on the same approximately 60-acre site as the proposed project and would incorporate similar roadway, landscaping, utility, and frontage improvements. However, Alternative 3 would replace approximately 24 residential lots with a 4-acre neighborhood-serving retail component, while the remaining 234 residential lots would retain the same lot size configurations as the proposed project. Alternative 3 would not result in a substantial adverse effect on views of a scenic vista because the project site is surrounded by existing residential development and no scenic vistas are visible from the project site. Furthermore, the proposed retail component would be constructed consistent with the City's Development Standards in the General Plan, the Southport Framework Plan Design Guidelines, and the Municipal Code, and would not exceed the maximum building height permitted under the site's land use designation or zoning. To accommodate the retail use, Alternative 3 would require an Amendment to the City's General Plan, an Amendment to the Southport Framework Plan to redesignate the 4-acre parcel from RE to MU-NC, and a Zoning Map/Code Amendment to rezone the parcel from RE to MU-NC. For these reasons, Alternative 3 would not substantially alter public viewpoints or obstruct scenic vistas. Additionally, Alternative 3 would not result in impacts to scenic resources within a State Scenic Highway, as there are no officially listed or eligible State Scenic Highways in the vicinity of the project site.

Alternative 3 would introduce new sources of light and glare that would generally be greater than the proposed project, as the retail component is assumed to include additional lighting for the surface parking lot, security lighting, and outdoor lighting for seating areas. However, Alternative 3 would be developed consistent with all applicable zoning development standards, General Plan goals and policies related to aesthetics and scenic quality, the Southport Framework Plan Design Guidelines, and the Citywide Design Guidelines, including Municipal Code Section 17.22.080, which requires full cut-off fixtures and limits on light trespass. Compared to the proposed project, Alternative 3 would result in less than significant impacts related to aesthetics but would have nominally greater impacts associated with visual character and lighting due to the addition of a retail component in a primarily residential area.

Agricultural Resources. Under Alternative 3, the project would be developed on the same approximately 60-acre site as the proposed project and would incorporate similar roadway, landscaping, utility, and frontage improvements. However, Alternative 3 would replace approximately 24 residential lots with a 4-acre neighborhood-serving retail component, while the remaining 234 residential lots would retain the same lot size configurations as the proposed project. As Alternative 3, would develop the same site as the proposed project, impacts to agricultural and forestry resources would be similar to those resulting from the proposed project. Consistent with the proposed project, less than significant impacts to agriculture and forestry resources would occur

under this alternative. The level of impact associated with this issue would remain the same under Alterative 3 compared to the proposed project.

Air Quality. Under Alternative 3, the project would be developed on the same approximately 60-acre site as the proposed project and would incorporate similar roadway, landscaping, utility, and frontage improvements. However, Alternative 3 would replace approximately 24 residential lots with a 4-acre neighborhood-serving retail component, while the remaining 234 residential lots would retain the same lot size configurations as the proposed project. Construction activities under Alternative 3 would be similar in type and extent to the proposed project but may have an extended period due to the construction of an additional retail component. Although the number of proposed residential units under this alternative would be reduced, the addition of the retail component would likely increase operational emissions, including those associated with vehicle trips, as it is assumed that the retail uses would attract customers, employees, and delivery vehicles on a daily basis. As a result, emissions of criteria pollutants associated with mobile sources could increase relative to the proposed project. However, similar to the proposed project, construction of the proposed project would still require implementation of **Regulatory Compliance Measure AIR-1,** which requires incorporation of fugitive dust measures consistent with YSAQMD's Rule 2.11 and **Mitigation Measure AIR-1**, which requires all off-road diesel-powered construction equipment of 25 horsepower or more used during construction of the proposed project shall be equipped with Tier 3 engines or higher, as certified by the California Air Resources Board. Therefore, consistent with the proposed project, Alternative 2 would result in less than significant impacts to air quality with implementation of **Regulatory Compliance Measure AIR-1** and **Mitigation Measures AIR-1** and compliance with applicable regulatory requirements.

Biological Resources. Under Alternative 3, the project would be developed on the same approximately 60-acre site as the proposed project and would incorporate similar roadway, landscaping, utility, and frontage improvements. However, Alternative 3 would replace approximately 24 residential lots with a 4-acre neighborhood-serving retail component, while the remaining 234 residential lots would retain the same lot size configurations as the proposed project. Construction activities under Alternative 3 would be similar in type and extent to the proposed project but may have an extended period due to the construction of an additional retail component.

Similar to the proposed project, Alternative 3 would involve disturbance of the approximately 60-acre project site, resulting in the conversion of ruderal grassland to developed land uses and the permanent loss of approximately 58.34 acres of potential foraging habitat for special-status wildlife.[2] Accordingly, like the proposed project, development of Alternative 3 could adversely affect special-status wildlife species as a result of project-related activities and would also be required to implement **Mitigation Measures BIO-1** through **BIO-4**, which require preconstruction nesting surveys, establishment of appropriate no-disturbance buffers around active nests, coordination with CDFW as needed, and biological monitoring during construction if work occurs within buffer areas consistent with Yolo HCP/NCCP *AMM16*, *Minimize Take and Adverse Effects on Swainson's Hawk and White-Tailed Kite*) to reduce potential impacts to Swainson's hawk, white-tailed kite, and other nesting birds to a less than significant level. Similar to the proposed project, Alternative 3 would be subject to the provisions of the City's Tree Preservation Ordinance **(Regulatory Compliance Measure**

[2] Ibid.

BIO-1), the requirements of the Yolo HCP/NCCP application and fee requirements (**Regulatory Compliance Measure BIO-2),** the Migratory Bird Treaty Act, and California Fish and Game Code. Because Alternative 2 would be located on the same project site, it would also be subject to the Yolo HCP/NCCP and would be required to implement Mitigation **Measures BIO-5** through **BIO-8**, which require worker training, confining and delineating work areas, controlling nighttime lighting, and minimizing impacts from staging and temporary work areas. However, similar to the proposed project, Alternative 3 would not result in adverse effects on any riparian habitat or other sensitive natural community or result in adverse effects on state or federally protected wetlands as none of these resources are present at the project site. Therefore, consistent with the proposed project, Alternative 3 would result in less than significant impacts to biological resources with implementation of **Mitigation Measures BIO-1** through **BIO-8** and compliance with applicable regulatory requirements.

Cultural Resources. Under Alternative 3, the project would be developed on the same approximately 60-acre site as the proposed project and would incorporate similar roadway, landscaping, utility, and frontage improvements. However, Alternative 3 would replace approximately 24 residential lots with a 4-acre neighborhood-serving retail component, while the remaining 234 residential lots would retain the same lot size configurations as the proposed project. Construction activities under Alternative 3 would be similar in type and extent to the proposed project but may have an extended construction period due to the installation of an additional retail component. Alternative 3 would not cause a substantial adverse change in the significance of a historical resource as neither the project site nor existing structure qualifies as an “historical resource” as defined by CEQA. Similar to the proposed project, Alternative 3 would have the potential to impact previously undiscovered archaeological resources and human remains because it would require ground-disturbing activities. Accordingly, Alternative 3 would be required to implement **Regulatory Compliance Measure CUL-1**, which requires that any identified remains be treated in accordance with Section 7050.5 of the HSC and PRC Section 5097. Alternative 3 would also be required to implement **Mitigation Measures CUL-1, TCR-1** and **TCR-2** which require the protection of known and unknown archaeological resources; WEAP training prior to ground-disturbing activities; and archaeological monitoring during all ground-disturbing activities. Therefore, consistent with the proposed project, Alternative 2 would result in less than significant impacts to cultural resources with implementation of mitigation measures.

Energy. Under Alternative 3, the project would be developed on the same approximately 60-acre site as the proposed project and would incorporate similar roadway, landscaping, utility, and frontage improvements. However, Alternative 3 would replace approximately 24 residential lots with a 4-acre neighborhood-serving retail component, while the remaining 234 residential lots would retain the same lot size configurations as the proposed project. Construction activities under Alternative 3 would be similar in type and extent to the proposed project but may have an extended period due to the construction of an additional retail component. Although the number of proposed residential units under this alternative would be reduced, the addition of the retail component would likely increase energy usage, including electricity and natural gas consumption associated with commercial building operations, lighting, heating and cooling systems, refrigeration and equipment, and other tenant activities. The retail component would also generate energy demand associated with employee, customer, and delivery vehicle trips, resulting in increased transportation fuel consumption relative to the proposed project. However, similar to the proposed project, Alternative

3 would be required to adhere to all federal, State, and local requirements for energy efficiency, including the Title 24 standards. Therefore, Alternative 3 would not be expected to result in the wasteful, inefficient, or unnecessary consumption of energy resources. Overall, under Alternative 3, construction and operational energy impacts would be more than the proposed project due to the addition of a retail component. Nevertheless, implementation Alternative 3 would result in less than significant impacts to energy, similar to the proposed project.

Geology and Soils. Under Alternative 3, the project would be developed on the same approximately 60-acre site as the proposed project and would incorporate similar roadway, landscaping, utility, and frontage improvements. However, Alternative 3 would replace approximately 24 residential lots with a 4-acre neighborhood-serving retail component, while the remaining 234 residential lots would retain the same lot size configurations as the proposed project. Alternative 3 would not result in any impacts associated with rupture of a known earthquake fault, seismic-related ground failure, landslides, lateral spreading, liquefaction, subsidence, or collapsible soils, as these hazards are not present at the project site. Similar to the proposed project, the site is classified as Site Class D, which indicates a moderate potential for seismic ground shaking consistent with regional conditions, but not within an Alquist-Priolo Earthquake Fault Zone. The site is also underlain by clay soils with moderate to very high expansion potential, and one abandoned oil and gas well is present on the property. In addition, paleontological resources could be encountered during ground disturbance. Therefore, **Mitigation Measures GEO-1** through **GEO-3,** which require implementation of geotechnical design recommendations, treatment of expansive soils, and implementation of paleontological resource procedures, would remain applicable to Alternative 3, as prescribed for the proposed project. Therefore, consistent with the proposed project, Alternative 3 would result in less than significant impacts to geology and soils with implementation of **Mitigation Measures GEO-1** through **GEO-3.**

Greenhouse Gas Emissions. Under Alternative 3, the project would be developed on the same approximately 60-acre site as the proposed project and would incorporate similar roadway, landscaping, utility, and frontage improvements. However, Alternative 3 would replace approximately 24 residential lots with a 4-acre neighborhood-serving retail component, while the remaining 234 residential lots would retain the same lot size configurations as the proposed project. Construction activities under Alternative 3 would be similar in type and extent to the proposed project but may have an extended period due to the construction of an additional retail component which could increase short-term GHG emissions relative to the proposed project. However similar to the proposed project, there is no threshold of significance for construction-related GHG emissions in areas subject to YSAQMD jurisdiction. Additionally, it is assumed that the addition of the retail component would slightly increase operational GHG emissions associated with mobile sources (e.g., vehicle and truck trips), area sources (e.g., maintenance activities and landscaping), indirect emissions from sources associated with energy consumption, waste sources (land filling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution) due to the increased intensity of daily operational activity associated with commercial land uses. However similar to the proposed project, GHG emissions under Alternative 3 may be evaluated based on locally adopted quantitative thresholds or consistency with a regional GHG reduction plan (e.g., a Climate Action Plan as the YSAQMD has not established a numeric threshold for GHG emissions. Additionally, it is assumed that Alternative 3 would also be consistent with applicable goals and

CAAP actions of the City of West Sacramento's CAAP. Overall, under Alternative 3, construction and operational GHG impacts would be more than the proposed project due to the addition of a retail component. Nevertheless, implementation Alternative 3 would result in less than significant impacts related to GHG emissions, similar to the proposed project.

Hazards and Hazardous Materials. Under Alternative 3, the project would be developed on the same approximately 60-acre site as the proposed project and would incorporate similar roadway, landscaping, utility, and frontage improvements. However, Alternative 3 would replace approximately 24 residential lots with a 4-acre neighborhood-serving retail component, while the remaining 234 residential lots would retain the same lot size configurations as the proposed project. Because Alternative 3 would occur on the same site as the proposed project, it would be subject to the same environmental conditions identified in the Phase I ESA, including the potential for residual agricultural chemicals in soils, the presence of a partially buried 55-gallon drum, and one abandoned dry-hole gas well in the northeastern portion of the site. Consistent with the proposed project, **Mitigation Measure HAZ-1** and **Mitigation Measure HAZ-2** which requires implementation of Phase I ESA recommendations and coordination with CalGEM would remain applicable to Alternative 3 to reduce the potential of hazardous materials encountered during construction. Similar to the proposed project, Alternative 3 would not result in any impacts associated with being included on a hazardous materials site pursuant to Government Code Section 65962.5, being located within an airport land use plan or within two miles of a public airport or exposing people or structures to a significant risk of loss, injury, or death involving wildland fires, as the project site is not located in an area affected by these hazards.

Construction of Alternative 3, like the proposed project, would involve the routine transport, use, and disposal of limited quantities of fuels, lubricants, and other materials typical of residential and retail development. Compliance with federal and State regulations, including OSHA and Cal/OSHA standards, USDOT requirements, RCRA, and California Code of Regulations Title 22, would ensure that these activities do not create a significant hazard. In addition, because construction would disturb more than one acre, Alternative 3 would be required to obtain coverage under the Construction General Permit and prepare a SWPPP pursuant to **Regulatory Compliance Measure WQ-1**. In addition, if Alternative 3, requires groundwater dewatering during construction, **Regulatory Compliance Measure WQ-2** which requires compliance with the Central Valley RWQCB's Groundwater Discharge Permit, would also be applicable.

Consistent with the proposed project, construction activities associated Alternative 3 may affect emergency access and response times, due to potential partial lane closures along Marshall Road and Otis Aveune. However, internal access roads would be constructed throughout the project site during construction activities to provide emergency response vehicles with access to residential development. As such, in order to maintain traffic flows to the greatest extent practicable during construction, the construction contractor would be required to prepare and implement a TMP (**Regulatory Compliance Measure TRA-1)**, to maintain traffic flow along Marshall Road, and Otis Aveune, safe access into and out of the project site, and emergency access to the project site and adjacent areas during construction, consistent with the proposed project. Additionally, during operation of Alterative 3, hazardous materials use would be limited to small quantities of cleaning products, landscaping chemicals, and consumer goods associated with residential and retail uses.

These materials would be stored, used, and disposed of in accordance with manufacturers' instructions and applicable regulations. No schools are located within 0.25 mile of the site, and therefore Alternative 3 would not emit hazardous emissions or handle acutely hazardous materials in proximity to a school similar to the proposed project. Under Alternative 3, all roadways would be designed and constructed to adequate widths for public safety pursuant to City requirements, and structures, roadways, and facilities would be designed and constructed in accordance with CFC requirements. Therefore, implementation of Alternative 3 would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Consistent with the proposed project, Alternative 3 would result in less than significant impacts related to hazards and hazardous materials with implementation of **Mitigation Measures HAZ-1** and **HAZ-2** and compliance with **Regulatory Compliance Measures WQ-1, WQ-2,** and **TRA-1**.

Hydrology and Water Quality. Under Alternative 3, the project would be developed on the same approximately 60-acre site as the proposed project and would incorporate similar roadway, landscaping, utility, and frontage improvements. However, Alternative 3 would replace approximately 24 residential lots with a 4-acre neighborhood-serving retail component, while the remaining 234 residential lots would retain the same lot size configurations as the proposed project. Because Alternative 3 would occur on the same site as the proposed project, it would be subject to the same hydrologic and water quality conditions identified in the Drainage Study, Water Study, Supplemental Water Model Update Memorandum, and Runoff Control Plan prepared for the project. Construction and ground-disturbing activities under Alternative 3 would result in the potential for soil erosion and discharge of pollutants to receiving waters. However, consistent with the proposed project, Alternative 3 would be required to obtain coverage under the Construction General Permit and prepare a SWPPP pursuant to **Regulatory Compliance Measure WQ-1**. In addition, if groundwater dewatering is required under this Alterative, during construction activities, additional BMPs would be required consistent with the Groundwater Discharge Permit to ensure that floodwaters would not impact the groundwater being pulled and disposed of. Compliance with the Groundwater Discharge Permit is detailed in **Regulatory Compliance Measure WQ-2**, would also be required.

During operation, Alternative 3 would generate stormwater runoff from both residential and retail uses. Compared to the proposed project, the retail component, which is assumed to also include surface parking, would introduce a greater proportion of impervious area than the 24 residential lots it would replace, which would otherwise include yards and landscaped areas. As a result, Alternative 3 could incrementally increase stormwater runoff volumes relative to the proposed project. However, similar to the proposed project, Alternative 3 would be required to comply with the Phase II MS4 Permit and the City's Stormwater Management Program pursuant to **Regulatory Compliance Measure WQ-3**, which requires preparation of a Final Post-Construction Standard Plan Worksheet and implementation of site design, source control, runoff reduction, and LID BMPs. In addition, under this Alterative, the detention basin would treat stormwater by temporarily storing runoff and releasing it at a controlled rate, thereby reducing peak flows and allowing suspended sediments and associated pollutants to settle prior to discharge.

In addition, because Alternative 3 would be developed on the same site as the proposed project, it would also be located within the natural floodplain of the Sacramento River and could be subject to

inundation if the levees were to fail. Similar to the proposed project, inundation of the site during a flood event could result in the release of pollutants, representing a potentially significant impact. Although Alternative 3 would be required to comply with Chapter 15.50 of the City's Municipal Code **(Regulatory Compliance Measure WQ-4)**, which requires either constructing flood management improvements or other mitigation measures beyond those required under the City's Floodplain Management Ordinance (Title 18), or paying the in-lieu flood management fee established by City Council resolution, compliance with Chapter 15.50 would not eliminate the potential for pollutant release during inundation. Therefore, similar to the proposed project, which would have less than significant impacts on hydrology and water quality with implementation of regulatory compliance and mitigation measures, except for flooding. Therefore, similar to the proposed project, flooding impacts under Alternative 3 would be significant and unavoidable.

Land Use and Planning. Under Alternative 3, the project would be developed on the same approximately 60-acre site as the proposed project and would incorporate similar roadway, landscaping, utility, and frontage improvements. However, Alternative 3 would replace approximately 24 residential lots with a 4-acre neighborhood-serving retail component, while the remaining 234 residential lots would retain the same lot size configurations as the proposed project. To accommodate the proposed retail use, under this Alternative, an Amendment to the City's General Plan and Amendment to the Southport Framework Plan would be required to change the land use designation from RE to MU-NC. In addition, a Zoning Map/Code Amendment would be required to rezone the area from RE to MU-NC. The MU-NC zone to provide areas for a mix of medium-density residential units that support commercial retail, office, and open space uses, allowing for lower-intensity mixed-use development with pedestrian-oriented shopping and services, would also be required. Consistent with the proposed project, the remaining 234 residential lots would maintain the same size configurations as the proposed project, primarily ranging from 5,000 to 7,200 square feet, with ten of the proposed oversized lots reaching up to 14,800 square feet. The remaining area of the project site would also be required to obtain an Amendment to the City's General Plan, an Amendment to the Southport Framework Plan to change designations from RE to LR, and a Zoning Map/Code Amendment to rezone the site from RE to R-1-A.

As such, Alternative 3 would not result in the physical division of an established community. While it would require land use amendments to accommodate the retail component, these changes would remain consistent with the City's planning framework for mixed-use neighborhood development and would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, consistent with the proposed project, Alternative 3 would not result in significant impacts related to land use and planning.

Mineral Resources. Under Alternative 3, the project would be developed on the same approximately 60-acre site as the proposed project and would incorporate similar roadway, landscaping, utility, and frontage improvements. Similar to the proposed project, Alternative 3 would not result in the loss of availability of a known mineral resource or a locally important mineral resource recovery site as there are no known mineral resources in the vicinity of the project site. Therefore, consistent with the proposed project, Alternative 3 would not result in impacts related to mineral resources.

Noise. Under Alternative 3, the project would be developed on the same approximately 60-acre site as the proposed project and would incorporate similar roadway, landscaping, utility, and frontage improvements. However, Alternative 3 would replace approximately 24 residential lots with a 4-acre neighborhood-serving retail component, while the remaining 234 residential lots would retain the same lot size configurations as the proposed project. Construction activities under Alternative 3 would be similar in type and extent to the proposed project but may have an extended period due to the construction of an additional retail component which could increase the duration of noise-generated during construction. However, similar to the proposed project, Alternative 3 would be required to implement **Mitigation Measure NOI-1**, which limits construction activities to daytime hours between 8:00 a.m. and 5:00 p.m. on weekdays. In addition, operation of the retail component would increase stationary noise sources and would also increase the number of vehicle trips to and from the project site. Overall, under Alternative 3, construction and operational noise impacts would be greater than the proposed project due to the development of a 4-acre retail component. Nevertheless, implementation of Alternative 3 would have a less than significant noise impact with implementation of **Mitigation Measures NOI-1**, similar to the proposed project.

Population and Housing. Under Alternative 3, the project would be developed on the same approximately 60-acre site as the proposed project and would incorporate similar roadway, landscaping, utility, and frontage improvements. However, Alternative 3 would replace approximately 24 residential lots with a 4-acre neighborhood-serving retail component, while the remaining 234 residential lots would retain the same lot size configurations as the proposed project. Alternative 3 would result in the construction of approximately 234 single-family homes, generating an estimated 658 new residents (about 67 fewer than the proposed project's 725 residents). Similar to the proposed project, Alternative 3 would increase the City's population; however, the increase would be slightly less than the proposed project and would represent only about 0.7 percent of the City's projected 2040 population. This level of growth would be consistent with SACOG's MTP/SCS forecasts and the City's Housing Element and would not constitute substantial unplanned population growth. Alternative 3 would also introduce a small number of retail jobs associated with the 4-acre neighborhood-serving retail component. However, it is reasonable to assume that most positions would be filled by existing City or County residents. Because the site is currently undeveloped, Alternative 3 would not displace existing housing or residents. Therefore, although Alternative 3 would result in fewer new residents than the proposed project and introduce a limited number of retail jobs, it would similarly result in a less than significant impact on population and housing and would have a slightly smaller impact than the proposed project.

Public Services. Under Alternative 3, the project would be developed on the same approximately 60-acre site as the proposed project and would incorporate similar roadway, landscaping, utility, and frontage improvements. However, Alternative 3 would replace approximately 24 residential lots with a 4-acre neighborhood-serving retail component, while the remaining 234 residential lots would retain the same lot size configurations as the proposed project. Compared to the proposed project Alternative 3, the project site would be developed with approximately 234 single-family residential units and would generate approximately 658 new residents, representing a reduction of about 67 residents. While the retail component would introduce employees to the project site, it is reasonable to assume that the majority of these positions would be filled by existing City or County residents and therefore would not result in a substantial increase to the City's population.

Like the proposed project, Alternative 3 would increase demand for fire and police protection; however, this increase in demand would be slightly higher than the proposed project due to the inclusion of a retail component, which would introduce additional calls for service given the increase of daytime population at the project site. Although Alternative 3 would include a reduction in residential units, resulting in somewhat lower residential-generated demand compared to the proposed project, this reduction would be offset by the added commercial activity, which typically generates a higher frequency of service calls. Additionally, fire and police services would continue to be provided by the WSFD and the WSPD. Consistent with the proposed project, operation of Alternative 3 would also require the payment of Fire and Police Facilities Development Fees as detailed in **Regulatory Compliance Measures PS-1** and **PS-2**, which would ensure that the project contributes its fair share toward maintaining adequate service levels.

Like the proposed project, Alternative 3 would increase demand for schools within the WUSD and other public services. However, because Alternative 3 would develop fewer residential units, the demand for these services would be slightly reduced. Consistent with the proposed project, Alternative 3 would be required to pay impact and development fees pursuant to **Regulatory Compliance Measures PS-3** through **PS-5**, which provide funding for new facilities and equipment. Payment of these fees would offset potential impacts to public facilities, ensuring that impacts remain less than significant. Therefore, although Alternative 3 would result in slightly fewer residents compared to the proposed project, consistent with the proposed project, Alternative 3 would result in less than significant impacts related to public services with implementation of **Regulatory Compliance Measures PS-1** through **PS-5** and **TRA-1**.

Recreation. Under Alternative 3, the project would be developed on the same approximately 60-acre site as the proposed project and would incorporate similar roadway, landscaping, utility, and frontage improvements. However, Alternative 3 would replace approximately 24 residential lots with a 4-acre neighborhood-serving retail component, while the remaining 234 residential lots would retain the same lot size configurations as the proposed project. Alternative 3 is anticipated to generate approximately 658 new residents, compared to 725 under the proposed project, and would therefore generate slightly less demand on parks and recreational facilities. While employees of the retail component may occasionally use the on-site recreational amenities, they are not expected to substantially increase demand for City parks. Similar to the proposed project, Alternative 3 would include approximately 6.65 acres of open space consisting of the Central Park, parklet, landscaped lots, and the detention basin. Additionally, landscaping would be installed throughout the residential areas and open space lots. Consistent with the proposed project, Alternative 3 would also require the payment of park fees as specified in **Regulatory Compliance Measure PS-4**. Implementation of **Regulatory Compliance Measure PS-4** would ensure that Alternative 3 would not cause or accelerate substantial physical deterioration of existing recreational facilities. Therefore, like the proposed project, which would have less than significant recreation impacts, Alternative 3 would also have less than significant recreation impacts, and this alternative would result in slightly lower impacts than the proposed project due to the reduction in residential units.

Transportation. Under Alternative 3, the project would be developed on the same approximately 60-acre site as the proposed project and would incorporate similar roadway, landscaping, utility, and frontage improvements. However, Alternative 3 would replace approximately 24 residential lots with

a 4-acre neighborhood-serving retail component, while the remaining 234 residential lots would retain the same lot size configurations as the proposed project. Due to the slight reduction in residential units under Alternative 3 compared to the proposed project, the residential uses under Alternative 3 would generate fewer vehicle trips to and from the project site.

While Alternative 3 would result in fewer residential units as compared to the proposed project and the VMT impacts are expected to be slightly reduced, without quantification of the VMT associated with the reduced units or an alternative-specific VMT analysis, it cannot be determined if the reduction in residential development would result in VMT impacts below applicable levels of significance. In addition, the retail component under this Alternative is expected to generate additional VMT. Therefore, VMT rates under Alternative 3 are expected to remain above the established thresholds and impacts would be significant and unavoidable, similar to the proposed project.

Consistent with the proposed project, construction activities associated with Alternative 3 may affect emergency access and response times, due to potential partial lane closures along Marshall Road and Otis Aveune. However, internal access roads would be constructed to code, allowing emergency response vehicles with access to the residential development. As such, in order to maintain traffic flows to the greatest extent practicable during construction, the construction contractor would be required to prepare and implement a TMP (**Regulatory Compliance Measure TRA-1**), to maintain traffic flow along Marshall Road and Otis Aveune, safe access into and out of the project site, and emergency access to the project site and adjacent areas during construction. Overall, implementation of Alternative 3 would have a significant and unavoidable transportation impact related to VMT, similar to the proposed project.

Tribal Cultural Resources. Under Alternative 3, the project would be developed on the same approximately 60-acre site as the proposed project and would incorporate similar roadways, landscaping, utility, and frontage improvements. However, Alternative 3 would replace approximately 24 residential lots with a 4-acre neighborhood-serving retail component, while the remaining 234 residential lots would retain the same lot size configurations as the proposed project. Construction activities under Alternative 3 would be similar in type and extent to the proposed project but would occur over a slightly extended period due to the addition of the 4-acre retail component. However, similar to the proposed project, Alternative 3 would have the potential to impact previously undiscovered tribal cultural resources because it would require ground-disturbing activities. As such, **Mitigation Measures TCR-1** through **TCR-3**, **Mitigation Measure CUL-1,** and **Regulatory Compliance Measure CUL-1**, would also be required for Alternative 3 to reduce potential impacts to a less than significant level significance. Therefore, consistent with the proposed project, Alternative 3 would result in less than significant impacts to tribal cultural resources with implementation of mitigation measures.

Utilities and Service Systems. Under Alternative 3, the project would be developed on the same approximately 60-acre site as the proposed project and would incorporate similar roadway, landscaping, utility, and frontage improvements. However, Alternative 3 would replace approximately 24 residential lots with a 4-acre neighborhood-serving retail component, while the remaining 234 residential lots would retain the same lot size configurations as the proposed project. Similar to the proposed project, significant environmental effects would not occur due to the

relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities under Alternative 3. However, like the proposed project Alternative 3 would still be required to implement **Regulatory Compliance Measures WQ-3,** which requires the preparation of a Final Post-Construction Standard Plan Worksheet in compliance with the City's Phase II MS4 permit and the implementation of site design, source control, runoff reduction, storm water treatment, and LID BMPs to minimize stormwater runoff. Water demand, wastewater generation, and solid waste generation associated with Alternative 3 may be slightly higher compared to the proposed project. Although Alternative 3 would reduce the number of residential units by 24, it would introduce a 4-acre neighborhood-serving retail component. The retail use would generate new commercial water demand, wastewater flows, and solid waste, which would likely exceed the utility demands associated with the 24 residential units that would otherwise have been constructed. However, consistent with the proposed project, sufficient water supplies are available to serve the project, the wastewater treatment provider has adequate capacity to serve the project's projected demand, and the project would not generate solid waste in excess of local standards or in excess of the capacity of local infrastructure. Additionally, Alternative 3 would comply with federal, State, and local statutes and regulations related to solid waste, including agency permits, AB 341, SB 1016, and the CALGreen Code. Therefore, although Alternative 3 would result in slightly higher water demand, wastewater generation, and solid waste compared to the proposed project due to the addition of the retail component, consistent with the proposed project, Alternative 3 would result in less than significant impacts to utilities and service systems.

Wildfire. Under Alternative 3, the project would be developed on the same approximately 60-acre site as the proposed project and would incorporate similar roadway, landscaping, utility, and frontage improvements. However, Alternative 3 would replace approximately 24 residential lots with a 4-acre neighborhood-serving retail component, while the remaining 234 residential lots would retain the same lot size configurations as the proposed project. Alternative 3, like the proposed project, is not located within a very high fire hazard severity zone, landslide hazard zone, or an area at risk of wildfire. Therefore, Alternative 3 would not exacerbate wildfire risks or expose people or structures to significant risks, including downslope or landslides, as a result of runoff post-fire slope instability, or drainage changes. In addition, like the proposed project, Alternative 3 would also be located on the same site and would not expose occupants or structures to significant risks associated with downslope or downstream flooding, post-fire slope instability, or drainage changes.

Furthermore, like the proposed project Alternatives 3 would not physically impair or otherwise interfere with emergency response or evacuation in the project vicinity. Additionally, all structures and internal circulation paths associated with Alternative 3 would be developed in accordance with the City and WSFD emergency access standards. Therefore, Alternative 2 would not impair an adopted emergency response or emergency evacuation plan. Installation of all project-related utility improvements under Alternative 3 would be implemented in an urbanized setting in accordance with the current CBC, CFC, and applicable local ordinances, and impacts related to the installation or maintenance of infrastructure that may exacerbate fire risk or result in temporary or ongoing impacts to the environment would be less than significant. Therefore, consistent with the proposed project, Alternative 3 would result in less than significant impacts with mitigation incorporated related to wildfire.

5.4.3.3 Overview of Potential Impacts/Comparison to Proposed Project

As stated above, Alternative 3 would be located on the same approximately 60-acre site and would include similar landscaping, roadway, and utility improvements. The proposed 15 open space lots totaling approximately 6.65 acres, including the 0.68-acre Central Park, 0.14-acre parklet, 1.81 acres of landscaped lots, and 4.02-acre detention basin, would also be retained. The proposed frontage improvements along Marshall Road and Otis Avenue would be constructed under this alternative. Under Alternative 3, roughly 24 residential lots, primarily 5,000-square foot lots and one 7,200-square foot lot, would be replaced by a 4-acre neighborhood-serving retail component. This neighborhood-serving retail component is assumed to be bounded by the existing retention pond at Bridgeway Lakes Community Park to the west and Marshall Road to the north. To accommodate the retail component, this 4-acre area would require an Amendment to the City's General Plan, an Amendment to the Southport Framework Plan to change the designation from RE to MU-NC, and a Zoning Map/Code Amendment to rezone the area from RE to MU-NC. The MU-NC zone is intended to provide areas for a mix of medium-density residential units that support commercial retail, office, and open space uses. This zone allows for lower-intensity mixed-use development with residential townhomes, condos, and apartments integrated with pedestrian-oriented shopping, office, and open space. Uses are intended to provide essential daily services, retail needs, and recreational amenities within walking distance of the surrounding neighborhood. Residential densities range from 12–60 units per acre. This rezoning could also accommodate potential future higher-density residential development.

Additionally, under Alternative 3, the remaining 234 residential lots would maintain the same lot size configurations, primarily ranging from 5,000 to 7,200 square feet, with 12 proposed oversized lots reaching up to 14,800 square feet. Similar to the proposed project, this alternative would also require an Amendment to the City's General Plan, an Amendment to the Southport Framework Plan to change designations from RE to LR, and a Zoning Map/Code Amendment to rezone the site from RE to R-1-A for the remainder of the project site. Consistent with the proposed project, Alternative 3 would result in a significant and unavoidable transportation impact related to VMT.

5.4.3.4 Project Objectives

Alternative 3 would generally meet all of the project objectives because it would retain the same overall design as the proposed project, including residential development, open space areas, recreational amenities, roadway improvements, and utility infrastructure. However, objectives 7 and 8 would not be achieved to the same degree as under the proposed project because Alternative 3 would reduce residential density and total dwelling units to accommodate a 4-acre retail component within the project site. As a result, Alternative 3 would reduce the total number of residential units from 259 units to 234 units, a reduction of 25 units, and would provide fewer housing opportunities to assist the City in meeting its RHNA goals and would generate less development-related revenue to support public facility improvements compared to the proposed project. Therefore, Alternative 3 would generally meet all project objectives; however, objectives 7 and 8 would not be met to the same degree as the proposed project.

5.5 IDENTIFICATION OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an Environmentally Superior Alternative among the alternatives evaluated in an EIR. **Table 5.A: Comparison of the Environmental Impacts of the Proposed Project and Project Alternatives** provides, in summary format, a comparison of the level of impacts of each alternative compared to the proposed project. Based on the above analysis, Alternative 1, the No Project Alternative, would have the least impact to the environment because it would generally reduce construction and operational impacts. While Alternative 1 would generally reduce the impacts of the proposed project, it would not achieve the objectives of the proposed project including providing a mix of land uses and residential lot sizes with an innovative design approach; creating open space, green areas, recreational amenities, and multi-use pathways that advance smart growth principles; enhancing connectivity within and to adjacent neighborhoods and open spaces; improving the City's bicycle and pedestrian network; creating a diverse mix of housing types integrated with open space in a functional and logical manner; promoting sustainable neighborhood design through integrated landscape and environmental practices; providing new housing to assist the City in meeting its RHNA goals; and supporting necessary public facility improvements. Additionally, Alternative 1, consistent with the proposed project, would result in a significant and unavoidable hydrology and water quality impact related to flooding and a significant and unavoidable transportation impact related to VMT. While Alternative 1 would be environmentally superior in the technical sense in that contribution to the aforementioned impacts would be generally reduced, it would fail to achieve any of the eight project objectives. *State CEQA Guidelines* Section 15126.6(e)(2) provides that, if the No Project/No Build Alternative is the Environmentally Superior Alternative, then the EIR shall also identify an Environmentally Superior Alternative among the other alternatives.

With the exception of Alternative 1, the environmentally superior alternative would be Alternative 2, the Reduced Density / Rural Buffer Alternative. As discussed above and shown in **Table 5.A** below, Alternative 2 would result in similar or reduced environmental impacts compared to the proposed project. Although Alternative 2 would achieve all of the project objectives, it would not achieve objectives 7 or 8 to the same degree as the proposed project. Additionally, Alternative 2, consistent with the proposed project, would result in a significant and unavoidable hydrology and water quality impact related to flooding and a significant and unavoidable transportation impact related to VMT**.** While Alternative 3 would reduce some of the environmental impacts compared to the proposed project, it would increase construction and operational impacts associated with air quality, energy, greenhouse gas emissions, noise, public services and transportation due to the addition of a 4-acre retail component. Similar to Alternative 2, and the proposed project, Alternative 3 would also result in a significant and unavoidable hydrology and water quality impact related to flooding and a significant and unavoidable transportation impact related to VMT. For the reasons presented above, Alternative 2 was identified as the Environmentally Superior Alternative.

Table 5.A: Comparison of the Environmental Impacts of the Proposed Project and Project Alternatives

Impact Area	Proposed Project Impact After Incorporation of Mitigation (if required)	Alternative 1: No Project Alternative	Alternative 2: Reduced Density/Rural Buffer	Alternative 3: Mixed Use Alternative
Aesthetics	Less than Significant	Fewer	Similar	Similar
Agricultural Resources	Less than Significant	Fewer	Similar	Similar
Air Quality	Less than Significant[1,2]	Fewer	Fewer	More
Biological Resources	Less than Significant[1,2]	Fewer	Similar	Similar
Cultural Resources	Less than Significant[2]	Fewer	Similar	Similar
Energy	Less than Significant	Fewer	Fewer	More
Geology and Soils	Less than Significant[1]	Fewer	Similar	Similar
Greenhouse Gas Emissions	Less than Significant	Fewer	Fewer	Similar
Hazards and Hazardous Materials	Less than Significant[1,2]	Fewer	Similar	Similar
Hydrology and Water Quality	Less than Significant[1,2]	Similar, Significant Unavoidable	Similar, Significant Unavoidable	More, Significant Unavoidable
Land Use and Planning	Less than Significant	Fewer	Similar	Similar
Mineral Resources	No Impact	Fewer	Similar	Similar
Noise	Less than Significant[2]	Fewer	Fewer	More
Population and Housing	Less than Significant	Fewer	Fewer	Fewer
Public Services	Less than Significant[1,2]	Fewer	Fewer	More
Recreation	Less than Significant	Fewer	Fewer	Fewer
Transportation and Traffic	Significant and Unavoidable[1,2]	Fewer, Significant Unavoidable	Fewer, Significant Unavoidable	More, Significant Unavoidable
Tribal Cultural Resources	Less than Significant[1]	Fewer	Similar	Similar
Utilities and Service Systems	Less than Significant[2]	Fewer	Fewer	More
Wildfire	Less than Significant[1,2]	Fewer	Similar	Similar

Source: LSA (2026)

[1] Mitigation Measure(s) Required

[2] Regulatory Compliance Measure(s) Required

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6.0 OTHER CEQA CONSIDERATIONS

As required under California Environmental Quality Act (CEQA), this chapter discusses the following types of impacts that could result from implementation of the proposed project. This includes a summary of significant and unavoidable impacts, significant irreversible environmental changes, and growth inducing impacts.

6.1 SUMMARY OF SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(c) of the *State CEQA Guidelines* requires that an EIR describe any significant impacts that cannot be avoided. Specifically, Section 15126.2(c) states that an EIR shall:

> "Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described."

The Executive Summary of this document (Chapter 1.0) contains a detailed summary that identifies the proposed project's environmental impacts as compared to existing conditions, proposed mitigation measures, and the level of significance of any impacts after mitigation. As described in further detail in Chapter 4.0, Existing Environmental Setting, Environmental Analysis, Impacts, and Mitigation Measures, implementation of the proposed project would result in less than significant impacts to the following resource topics: Aesthetics, Agriculture and Forestry Resources, Energy, Greenhouse Gas Emissions, Land Use and Planning, Population and Housing, Public Services, Recreation, Utilities and Service Systems, and Wildfire. Additionally, as described in Chapter 4.0, with adherence to regulatory compliance measures and implementation of mitigation measures the proposed project would result in less than significant impacts to the following resources topics: Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Noise, and Tribal Cultural Resources. Implementation of the proposed project would result in impacts related to Hydrology and Water Quality (project-specific flooding), Transportation (VMT), and a cumulatively considerable Transportation impact related to VMT that would be considered significant, adverse, and unavoidable after all mitigation is applied. These impacts are described further below and in detail in Chapter 4.0.

6.1.1 Hydrology and Water Quality (Project-Specific Flooding Impact)

As discussed in Section 4.10, Hydrology and Water Quality, the entire city is within the natural floodplain of the Sacramento River and could be subject to inundation in the event a levee fails. Although adherence to Chapter 15.50 of the City's Municipal Code, as detailed in **Regulatory Compliance Measure WQ-4**, would require either constructing flood management improvements or other mitigation measures, beyond those set forth in City's Floodplain Management Ordinance (Title 18 of the Municipal Code) or paying the "in-lieu" flood management fee in an amount established by resolution of the City Council, no mitigation would reduce the potential flooding impact to less than significant. Accordingly, because the project site is located in a flood hazard zone (i.e., 200-year flood

plain as mapped by the DWR pursuant to SB 5) and inundation at the project site could occur during a flood event, the proposed project could result in the release of pollutants due to inundation. Therefore, impacts would be **significant and unavoidable**.

6.1.2 Transportation (Project-Specific Vehicle Miles Traveled Impact)

As discussed in Section 4.17, Transportation, of this Draft EIR, the proposed project's VMT rate would exceed the regional 85 percent threshold (17.43). Because the project's residential VMT exceed the regional threshold, the project would not meet the screening criteria for a less than significant impact under CEQA. Although the proposed project would employ specific design features and proposes several VMT reduction measures, these measures would only result in an estimated 3.03 percent reduction in residential VMT per capita. Therefore, the proposed project would result in a **significant and unavoidable transportation impact related to VMT.**

Notwithstanding the significant and unavoidable impacts described above, implementation of the proposed project would fulfill the objectives described in Section 3.2, Project Objectives, of this EIR and further discussed in detail in Chapter 5.0, Alternatives. In particular, the proposed project would provide much needed residential development that would help the City meet its housing goals and make necessary improvements to public facilities through increased revenues by developing a well-designed neighborhood with open space, recreational amenities, and enhanced connectivity to the City's bicycle and pedestrian infrastructure.

6.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(d) of the *State CEQA Guidelines* requires that an EIR consider and discuss significant irreversible changes that would be caused by implementation of a proposed project. The *State CEQA Guidelines* specify that the use of nonrenewable resources during the initial and continued phases of a project should be discussed because a large commitment of such resources makes removal or non-use thereafter unlikely. Primary and secondary impacts (e.g., a highway improvement that provides access to a previously inaccessible area) should also be discussed because such changes generally commit future generations to similar uses. Irreversible damage can also result from environmental accidents associated with a project and should be discussed. These three categories of significant irreversible changes that should be considered are addressed below.

6.2.1 Changes in Land Use Which Commit Future Generations

As previously stated in Chapter 3.0, Project Description, the proposed project would require a GPA to the City's existing General Plan and an amendment to the Southport Framework Plan to change the designations from Rural Estates (RE) to Low-Density Residential (LR). It would also require a Zoning Map/Code amendment to rezone the site from Residential Rural Estates (RE) to Residential One Family (R-1-A). According to the City's General Plan, the LR designation is intended to provide single-family detached and attached homes, secondary residential units, public and quasi-public uses, and similar compatible uses, allowing a maximum residential density of 6.0 dwelling units pe acre (DUA). Additionally, the City's Zoning Code designates the R-1-A zoning district for single-unit dwellings while preserving the characteristics of existing single-unit neighborhoods. The R-1-A zoning district also permits public and quasi-public uses, as well as other compatible uses suited for a medium-

density residential environment, with allowed residential densities ranging from 1.1 to 6.0 dwelling units per gross acre. Although the project would require amendments to the General Plan, Southport Framework Plan, and Zoning Map/Code, these regulatory actions are discretionary and can be modified in the future if a subsequent entitlement or discretionary action is approved. Additionally, long-term physical improvements associated with the proposed project, including grading, roadway infrastructure, and utility installation, would represent irreversible commitments of resources. However, these physical changes would not commit future generations to a significant change in land use or zoning designation. At the end of the useful life of the development, the City could redesignate or rezone or the project site in the future.

6.2.2 Irreversible Damage from Environmental Accidents

No significant environmental damage, such as an accidental spill or explosion of hazardous material, is anticipated to occur with development of the proposed project. As described in Section 4.9, Hazards and Hazardous Materials, of this EIR, the project site does not include any active storage sites listed on the State Water Resources Control Board (SWRCB) Leaking Underground Storage Tanks database or the SWRCB's site cleanup program database, which are two of the component databases that comprise the California Environmental Protection Agency (Cal/EPA) Hazardous Waste and Substances Sites List (Cortese List) of known hazardous materials compiled pursuant to Government Code Section 65962.5. Active sites are not listed for the project on other components of the Cortese List, including the DTSC hazardous waste and substance list.

However, According to the Phase I ESA prepared for the project, two RECs were identified: (1) the site's historical agricultural use from 1937 through 2016, during which pesticides, herbicides, and fertilizers may have been applied or stored on site, creating the potential for residual chemicals in the soil; and (2) the presence of a partially buried 55-gallon drum of unknown contents near the former building in the northern portion of the site, which could have released contaminants to the soil. Although all onsite buildings and septic systems have since been demolished and removed, the buried drum and the potential for other subsurface materials remain a concern. No controlled recognized environmental conditions (CRECs) or historical recognized environmental conditions (HRECs) were identified. However, during project construction, potential hazards could occur through the disturbance and transport of soils containing residual pesticides/herbicides or from encountering buried materials and removal of the partially buried drum, which would result in a **potentially significant impact**. Accordingly, the proposed project would be required to implement **Mitigation Measure HAZ-1**, which requires compliance with the Phase I ESA recommendations which include geophysical survey and ACM sampling, to evaluate potential soil, vapor, and groundwater contamination. In addition, one dry-hole oil and gas well (API No. 0411320081) is located within the northeastern portion of the project site, approximately 80 feet south of Marshall Road. As of 2018, records indicate that the well, owned by Mobil Oil Exploration & Production North America, Inc., was plugged and abandoned. Given that this dry gas well has been abandoned, the potential for significant soil or groundwater impact is considered low; however, as the proposed project would involve the development or residences on this subject property, implementation of **Mitigation Measure HAZ-2**, which requires identification, evaluation, and management of abandoned wells in accordance with CalGEM guidance, would be required to reduce potential impacts to less than significant levels. Therefore, no irreversible changes, such as those which might

result from construction of a large-scale mining project; a hydroelectric dam project; or other institutional project, would result from development of the proposed project.

6.2.3 Consumption of Non-Renewable Resources

Consumption of non-renewable resources includes increased energy consumption, conversion of agricultural lands, and lost access to mining reserves. As discussed in Section 4.2, Agriculture and Forestry Resources, within the approximately 60-acre project site, 50.18 acres are classified as Farmland of Local Importance, 2.24 acres are classified as Farmland of Local Potential, and the remaining acreage is designated as Urban and Built-Up Land by the State Department of Conservation (DOC). Farmland of Local Importance refers to land that is important to the local economy as defined by each county's local advisory committee and adopted by its Board of Supervisors. Farmland of Local Importance is either currently producing or has the capability of production; but does not meet the criteria of Prime, Statewide, or Unique Farmland. According to Yolo County, Farmland of Local Importance is cultivated farmland having soils which meet the criteria for Prime or Statewide, except that the land is not presently irrigated, and other non-irrigated farmland. Farmland of Local Potential, which includes Prime or Statewide soils which are presently not irrigated or cultivated.[1] Urban and Built-Up Land is defined as land occupied by structures at a density of at least one unit per 1.5 acres, or approximately 6 units per 10-acre parcel. Given that the project does not propose to convert any farmland of Statewide or regional significance, such as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland, and because the conversion of this site has already been anticipated and planned, impacts related to the loss of agricultural land would be less than significant. In addition, as discussed in Section 4.12, Mineral Resources, the project site does not contain known mineral resources and does not serve as a mining reserve; thus, development of the proposed project would not result in the loss of access to mining reserves.

As discussed in Section 4.5, Energy, the proposed project would consume energy through fuel usage associated with project construction and day-to-day operations. Project construction activities would require energy resources primarily in the form of fuel consumption to operate construction equipment, delivery vehicles and haul trucks, and construction worker vehicles. The construction-related equipment would be fueled by diesel fuel and gasoline. No natural gas demand is anticipated during construction. While some electricity may be required during construction activities, associated with generators and lighting, this analysis assumes that most energy required during project construction would be associated with fuel consumption. As shown in **Table 4.5.A: Energy Consumption Estimates During Construction**, in Section 4.5, construction associated with the proposed project would consume approximately 140,590.0 gallons of diesel fuel and approximately 32,508.7 gallons of gasoline during the construction period. Based on fuel consumption obtained from EMFAC2025, approximately 74.7 million gallons of gasoline and approximately 34.7 million gallons of diesel will be consumed from vehicle trips in Yolo County in 2027. Therefore, the proposed project would increase the annual construction-generated fuel use in Yolo County by approximately 0.3 percent for diesel fuel usage and by approximately less than 0.1 percent for gasoline fuel usage.

[1] California Department of Conservation. 2018. *Important Farmland Categories. Farmland of Local Importanc*e. Website: https://www.conservation.ca.gov/dlrp/fmmp/Documents/Farmland_of_Local_Importance_2018.pdf (accessed February 2026).

Due to the minimal increase in annual fuel consumption in Yolo County, project construction activities would have a negligible effect on local and regional energy supplies. Furthermore, impacts related to energy use during construction would be temporary and relatively small in comparison to Yolo County's overall use of the State's available energy resources.

Energy use associated with operation of the proposed project would consist of electricity consumption, and fuel used for residential vehicle trips associated with the project. Energy consumption was estimated for the proposed project using default energy intensities by land use type in CalEEMod. As shown in **Table 4.5.B: Energy Consumption Estimates**, in Section 4.5, the estimated potential increase in operational electricity demand associated with the proposed project is 4,416,340 kilowatt-hours (kWh) per year. Total electricity consumption in Yolo County in 2024 was 1,825 gigawatt hours (GWh) (or 1,825,000,000 kWh). Operational activities associated with the proposed project would increase the annual electricity consumption in Yolo County by approximately 0.2 percent. The proposed project's electrical demand would be relatively small in comparison to Yolo County's overall use of the State's available electricity resources. Accordingly, the proposed project's electrical demand would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

Furthermore, fuel use associated with the vehicle trips generated by proposed project is estimated at approximately 469,540.7 gallons of gasoline and 65,028.3 gallons of diesel fuel per year. This analysis conservatively assumes that all vehicle trips generated as a result of project operation would be new to Yolo County. Based on fuel consumption obtained from EMFAC2025, approximately 77.8 million gallons of gasoline and approximately 34.4 million gallons of diesel will be consumed from vehicle trips in Yolo County in 2028. Therefore, vehicle and truck trips associated with the proposed project would increase the annual fuel use in Yolo County by 0.6 percent for gasoline fuel usage and by approximately 0.2 percent for diesel fuel usage. Gasoline and diesel fuel demand generated by vehicle trips associated with the proposed project would be a minimal fraction of gasoline and diesel fuel consumption in Yolo County. Accordingly, the proposed project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Therefore, the proposed project would not result in a significant impact associated with the consumption of non-renewable resources.

6.3 GROWTH-INDUCING IMPACTS

Sections 15126(d) and 15126.2(e) of the *State CEQA Guidelines* require that an EIR analyze growth-inducing impacts and discuss the ways in which a proposed project could foster economic or population growth or construction of additional housing, either directly or indirectly, in the surrounding environment. Section 15126.2(d) of the *State CEQA Guidelines* also requires a discussion of the characteristics of projects that may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. A project is typically considered growth inducing: (1) if it would foster economic or population growth or the construction of additional housing; (2) if it would remove obstacles to population growth or tax community services to the extent that the construction of new facilities would be necessary; or (3) if it would

encourage or facilitate other activities that cause significant environmental effects.[2] Examples of projects likely to have significant growth-inducing impacts include extensions or expansions of infrastructure systems beyond what is needed to serve project-specific demand, and development of new residential subdivisions or industrial parks in areas that are currently only sparsely developed or are undeveloped.

Implementation of the proposed project would result in direct population growth within the City of West Sacramento specifically through the construction of 259 dwelling units. As discussed in Section 4.14, Population and Housing, the proposed project involves the subdivision of an approximately 60-acre property to create 259 lots for future single-family homes, comprising approximately 34.78 acres of residential development and 15 open space lots totaling 6.65 acres. The open space lots would include a 0.68-acre Central Park, a 0.14-acre parklet at the corner of Marshall Road and Otis Avenue, and 1.81 acres of landscaped lots distributed throughout the proposed development to provide greenspace and buffers. Additionally, the open space areas would include a 4.02-acre detention basin, which would also serve as a recreational field during dry seasons.

According to the City's 2021-2029 Housing Element Update,[3] the estimated amount of people per household in West Sacramento is approximately 2.8 people. Assuming a 2.8 people per household ratio, the proposed project would result in a net increase of approximately 725 persons upon development of the proposed project.[4] In addition, the SACOG Board of Directors adopted the Cycle 6 (2021 to 2029) Regional Housing Needs Plan which provides the number of total housing units that each jurisdiction in the SACOG region must zone for during the Cycle 6 to 8-year period. According to the adopted RHNA methodology, West Sacramento's housing need allocation for the planning period between 2021 and 2029 is 9,471 units (2,287 very low-income units, 1,378 low-income units, 1,722 moderate-income units, and 4,084 above moderate income units).[5] The total RHNA for the City of West Sacramento would be less than the projected housing growth included in the 2020 MTP/SCS Preferred Growth Scenario that indicates the City's housing is projected to increase by 16,400 units from 2016 to 2045.[6] The 725 new additional residents generated by the proposed project would represent approximately 0.8 percent of the projected 2040 population[7] and approximately, 0.7 percent of the 2040 projected households.[8] This represents a fraction of the anticipated growth in the City's population for 2040.

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2 *State CEQA Guidelines*. 2023. Section 15126.2(d).

3 City of West Sacramento. 2021. *2021-2029 Housing Element Update*. July.

4 259 households x 2.8 persons per household = 725 persons

5 Sacramento Area Council of Governments (SACOG). 2020. *SACOG Regional Housing Needs Plan. Cycle 6 (2021-2029) Adopted March 2020.* Website: https://www.sacog.org/home/showpublisheddocument/370/638218262676300000 (accessed February 2026).

6 Sacramento Area Council of Governments (SACOG). 2025. *2025 Blueprint (MTP/SCS)* Appendix C – *Land Use Forecast.* Website: https://www.sacog.org/home/showpublisheddocument/38/638212803200970000 (accessed February 2026).

7 (725 persons from the proposed project / 87,999 2040 projected population) x 100 = 0.8 percent of total 2040 population

8 (259 new housing units from the proposed project / 35,063 total projected household growth) × 100 = 0.7 percent of total projected household growth

Additionally, the project site is bounded to the north by Marshall Road, to the east by Otis Avenue and a mix of residential and agricultural uses, to the south by single-family residential uses, and to the west by an existing retention pond that is part of the Bridgeway Lakes Community Park, and the Bridgeway Lakes residential development. The project site is also currently characterized by lower-density zoning districts and land use designations. The areas within the Southport Framework Plan have been developed using a less intensive development pattern to avoid suburban sprawl. As discussed in Chapter 3.0, Project Description, the project site is currently designated as Rural Estate (RE) in both the City's General Plan and the Southport Framework Plan. The RE land use designation is intended for the development of single-family detached homes, secondary residential units, limited agricultural uses, public and quasi-public uses, and similar and compatible uses in a rural setting. The RE land use designation allows a maximum residential density of one dwelling unit for every 2.5 acres.[9] The project site is currently zoned as Residential Rural Estates (RE), which is intended to provide for residential development on large lots within rural residential areas. Upon approval of the proposed project, the project site would allow for higher residential densities and would be developed at an overall density of approximately 4.3 DUA. Accordingly, approval of the proposed project could encourage similar future General Plan amendments and up-zoning on adjacent or nearby parcels, which could contribute to long-term development pressure and potential densification within the Southport Rural Core. However, any future development proposals, including proposals to up-zone parcels within the Southport Rural Core would require separate discretionary approvals by the City and would be subject to project-specific environmental review pursuant to CEQA. Such review would evaluate the potential for growth-inducing impacts and consistency with applicable plans. In addition, the proposed project includes only residential and park uses on site. Commercial, industrial, or other uses that might result in increased employment opportunities in the City are not included in the proposed project. Therefore, the proposed project would not induce substantial unplanned population growth related to the introduction of new businesses to West Sacramento. Accordingly, the proposed project is consistent with planned regional housing growth and planned population growth of the City. Although the proposed project would result in an addition of 725 residents, these new residents would induce substantial unplanned population growth, as the proposed project would assist the City in achieving their RHNA.

While the proposed project may require water, sewer, drainage, and electricity, on site and in the immediate vicinity of the project site, such improvements would be intended primarily to meet project-related demand and would not necessitate substantial utility infrastructure improvements. In addition, all roadway improvements planned with respect to the proposed project are intended to provide for better circulation flows within the project site or allow vehicular access and would not foster off-site population growth. Accordingly, the proposed project would not require the extension of utilities or roads into undeveloped areas that are not planned for the expansion of infrastructure or directly or indirectly lead to development of greenfield sites that are not planned for development. Due to the location of the project site, the presence of existing uses in the vicinity of the site, and consistency with proposed development within the project area, development of the proposed project would not induce unplanned growth in the area. Therefore, the growth that would occur as a result of the proposed project would not be substantial or adverse.

[9] City of West Sacramento. 2024. *General Plan 2035*. January.

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7.0 LIST OF PREPARERS AND PERSONS CONSULTED

7.1 CITY OF WEST SACRAMENTO

The following individuals from the City of West Sacramento were involved in the preparation of this Draft EIR:

- Tristan Osborn, AICP, Planning Manager, Community Development Department
- Seamus Laffey, AICP, Senior Planner, Community Development Department
- Andrea Ouse, AICP, Community Development Director, Community Development Department
- Jimmy Fong, TE, Senior Transportation Engineer, Community Development Department
- Mark Collier, Principal Engineer, Community Development Department
- Bryan Jonson, Fire Marshal, Fire Department
- Kate Smith, Parks and Recreation Director, Parks and Recreation Department
- Paul Dirksen, Flood General Manager, Capital Projects Department
- Elaine Carlton, Crime Analyst, Police Department
- Marc Rotteveel, Development Finance Analyst, Finance Department

7.2 KRONICK MOSKOVITZ TIEDEMANN & GIRARD

The following individuals from the Kronick Moskovitz Tiedemann & Girard law firm were involved in the preparation of this Draft EIR:

- Alek Kocher, Associate Attorney, Kronick Moskovitz Tiedemann & Girard

7.3 EIR PREPARERS

The following individuals were involved in the preparation of this Draft EIR. The nature of their involvement is summarized below.

7.3.1 LSA Associates, Inc.

The following individuals were involved in the preparation of this Draft EIR:

- Theresa Wallace, AICP, Principal in Charge
- Chis Jones, AICP, Project Manager
- Lynnea Palecki, Environmental Planner
- Lauren Peachey, Environmental Planner
- Victoria Aispuro, Assistant Environmental Planner
- Lauren Johnson, Senior Technical Editor
- Chantik Virgil, Senior Word Processor
- Jessica Quigley, GIS Specialist
- Mitchell Alexander, GIS Specialist
- Mathew Phillips, Graphics Specialist
- Jason Thomas, Graphics Specialist

7.4 TECHNICAL REPORT PREPARERS

The following individuals were involved in the preparation of the technical reports in support of this Draft EIR. The nature of their involvement is summarized below.

7.4.1 Cullen-Sherry & Associates (CSA), Inc

The following individuals were involved in the preparation of the Topographic Survey (February 2022):

- Chris M Ferrucci

7.4.2 Continental Development Consultants, Inc.

The following individuals were involved in the preparation of the Drainage Study, the Water Study, and the Runoff Control Plan (April 2026, October 2025, and November 2024, respectively), and the Sewer Capacity Study (January 2026):

- Harsev Singh, M.S., PE, Senior Project Engineer

7.4.3 Dopudja & Wells Consulting, Inc.

The following individuals were involved in the preparation of the Sewer Technical Memorandum (March 2026):

- Pooja Lad, EIT
- Jon Wells, P.E.

7.4.4 Partner, Engineering and Science, Inc.

The following individuals were involved in the preparation of the Phase I Environmental Site Assessment (December 2021):

- William A. Mitchell, PG, Partner Associate
- Shannon Gillespie, Program Manager

7.4.5 Linscott, Law & Greenspan, Engineers (LLG)

The following individual was involved in the preparation of the Transportation Study (April 2025):

- K.C Yellapu, PE, TE, PTOE, Principal
- Erika Carino, PE, RSP Transportation Engineer III
- D. Garrett Readler, P.E.

7.4.6 LSA Associates, Inc.

The following individuals were involved in the preparation of the Air Quality, Greenhouse Gas, and Energy Impact Report (July 2026):

- Amy Fischer, Principal Air Quality Specialist
- Jessica Coria, Principal, Director of Air Quality and Climate Change Services
- Briette Shea, Senior Air Quality Specialist
- Bianca Martinez, Air Quality Specialist

The following individuals were involved in the preparation of the Biological Resources Report (September 2025):

- Mike Trueblood, Senior Biologist
- Anna Van Zuuk, Biologist

The following individuals were involved in the preparation of the Cultural Resources Assessment (June 2026):

- Lloyd Sample, Principal, Cultural and Paleontological Resources
- Cassidy Sharp, Archaeologist
- Jaimi Starr, Cultural Resources Assistant

The following individuals were involved in the preparation of the Noise and Vibration Impact Analysis (July 2026):

- John T. Stephens, Principal Noise and Vibration Specialist
- Moe Abushanab, Mechanical Noise Engineer

The following individuals were involved in the preparation of the Cumulative Transportation Analysis (July 2026):

- Ambarish Mukherjee, Principal, Transportation and Mobility
- Debmalya Sinha, Senior Transportation Planner
- Ravi Palakurthy, Senior Transportation Engineer

7.4.7 Raney Geotechnical, Inc.

The following individual was involved in the preparation of the Geotechnical Engineering Report and the Supplemental Geotechnical Recommendations (October 2024 and December 30, 2025):

- Matthew S. Moyneur, Senior Engineer
- Emily Holt Senior Staff Engineer

7.4.8 JTS Engineering Consultants, Inc.

The following individual was involved in the preparation of the Arieal Drone Survey (October 2024):

- Javed T. Siddiqui

7.5 PROJECT APPLICANT

- RBS Holdings, LLC

7.6 PERSONS CONSULTED

The following organization was consulted during the preparation of this Draft EIR:

- Yocha Dehe Wintun Nation

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